

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS, INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
Defendant.)	

**PLAINTIFF EPLUS'S OBJECTIONS TO DEFENDANT'S DESIGNATIONS AND
SUMMARY OF THE DEPOSITION OF MANUEL D. MATIAS AND COUNTER-
DESIGNATIONS**

Specific Objections

Defendant's Designations	ePlus's Objections (designations)	ePlus's Objections (summary)
5:22-25		
20:7-15		
24:6-10		
25:7-10	403	
27:9-24	403; 701 (27:18-24)	
29:3-13		
35:20-36:5		Mischaracterizes testimony (Mr. Matias testified that purchase orders from Robert Wood Johnson are transmitted via EDI from GHX to vendors, and that the vendors transmit information back to GHX in return)
37:3-11		Mischaracterizes testimony (Mr. Matias testified that the purchase order acknowledgement was viewable through a portal to GHX)
41:21-24	402	
53:21-24	Improper designation. Designation fails to include witness' answer. (106)	Mischaracterizes testimony (Mr. Matias testified that a user could search by the name Cardinal to pull up an item if the word

Defendant's Designations	ePlus's Objections (designations)	ePlus's Objections (summary)
		Cardinal appeared in the description or one of the other fields being searched)
84:4-85:2	701 (84:20-85:2)	
86:23-87:1	403	
88:8-20	402; 602	Mischaracterizes testimony (Mr. Matias testified that there was no way to determine the price of an item if there was no contract in place for the item in PO25)
89:4-90:2		Mischaracterizes testimony (Mr. Matias testified that Robert Wood Johnson was using GHX prior to licensing Lawson)
90:25-91:3	602	

Counter-Designations

ePlus's Counter-Designations
22:18-24:5
24:11-25:6
35:6-19
41:25-42:1
53:25-54:2
85:9-86:22
87:15-88:7
91:12-93:9

Respectfully submitted,

Dated: August 9, 2010

/s/

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Manuel D. Matias – Rebuttal Summary

Two vendor items can be associated with a single item in the Item Master. (22:18-24:5)
End users are able to select a vendor for an item available from more than one vendor.
(24:11-25:6)

GHX is a middleman repository for many healthcare facilities in the United States. GHX sends and receives EDI transactions on behalf of Robert Wood Johnson, which accesses this information from GHX. (35:6-19)

Manuel Matias was not aware of whether or not Robert Wood Johnson uses PO 26.6, substitute vendor items. (41:25-42:1)

The only noted difference between two items with the same description selected during the demonstration was the price of the items. Mr. Matias needed to do more research to determine why the price was different for the items. The difference between the items many have been only the quantity, since one item was available as an “each” (*i.e.*, 1 syringe), while the other item was measured by case (*i.e.*, 960 syringes). (85:9-86:22; 91:12-93:9)

The Lawson system employed at Robert Wood Johnson is configured to display the last purchase order price for an item when there is no price associated with an item. A price of zero indicates that there is no contract in place for that particular item. (87:15-88:7)

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<p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF VIRGINIA 3 RICHMOND DIVISION 4 CIVIL ACTION NO. 3:09-CV-620 (JRS)</p> <p>5 -----: 6 ePLUS, INC., : 7 : Civil Action 8 Plaintiff, : 9 : DEPOSITION UPON 10 vs. : ORAL EXAMINATION 11 : 12 LAWSON SOFTWARE, INC., : of 13 : 14 Defendant. : MANUEL D. MATIAS 15 -----: 16 17 TRANSCRIPT of the Videtaped Deposition of 18 MANUEL D. MATIAS, a Witness, called for Oral 19 Examination by the Plaintiff in the above-entitled 20 action, said deposition being taken pursuant to 21 Federal Rules of Civil Procedure, by and before 22 PATRICIA J. RUSSONIELLO, a Certified Court Reporter 23 and Notary Public of the State of New Jersey, at 24 the office of ROBERT WOOD JOHNSON UNIVERSITY 25 HOSPITAL, 120 Albany Street, New Brunswick, New Jersey, on Wednesday, March 10, 2010, commencing at 11:03 o'clock in the forenoon.</p>	<p>1 I N D E X 2 WITNESS DIRECT CROSS REDIRECT RECROSS 3 MANUEL D. MATIAS 4 By Mr. Clements 5 91 5 By Mr. Graham 83 93 6 7 8 E X H I B I T S 9 10 NUMBER DESCRIPTION PAGE 11 RWJ-1 Multi-page document, re, Plaintiff, 4 12 ePLUS, Inc.'s Notice Of Deposition Of 13 Third-Party Robert Wood Johnson 14 University Hospital and attachments 15 16 17 18 19 20 21 22 23 24 25</p>
<p>1 A P P E A R A N C E S: 2 GOODWIN PROCTER LLP 3 By JAMES D. CLEMENTS, ESQUIRE 4 53 State Street, Exchange Place 5 Boston, Massachusetts 02109 6 Tel: (617) 570-1000 Fax: (617) 523-1231 7 Attorneys for Plaintiff 8 9 MERCHANT & GOULD P.C. 10 By JOSHUA P. GRAHAM, ESQUIRE 11 3200 IDS Center 12 80 South Eighth Street 13 Minneapolis, Minnesota 55402-2215 14 Tel: (612) 332-5300 Fax: (612) 332-9081 15 Attorneys for Defendant 16 17 NORRIS, MC LAUGHLIN & MARCUS, P.A. 18 By JAMES J. SHRAGER, ESQUIRE 19 731 Route 202-206 20 Bridgewater, New Jersey 08807 21 Tel: (908) 722-0700 Fax: (908) 722-0755 22 Attorneys for Deponent 23 24 A L S O P R E S E N T: 25 Michael Ciliberti, Videographer Robert G. Irwin, RWJ Vice-President, Information Systems</p>	<p>1 (Exhibit RWJ-1 marked for 2 identification.) 3 THE VIDEOGRAPHER: Here begins 4 videotape number one in the deposition of Manuel 5 Matias in the matter of ePLUS Incorporated versus 6 Lawson Software in the U.S. District Court for the 7 Eastern District of Virginia, Case Number 8 3:09-CV-620., 9 Today's date is March 10th, 2010 and 10 the time on the video monitor is 11:03 a.m. 11 The video operator today is Mike 12 Ciliberti. This video deposition is taking place 13 at 120 Albany Street, New Brunswick, New Jersey. 14 Counsel, please voice identify 15 yourselves and state whom you represent. 16 MR. CLEMENTS: My name is James 17 Clements. I'm representing plaintiff, ePLUS. 18 MR. GRAHAM: Joshua Graham on behalf 19 of defendant, Lawson Software. 20 MR. SHRAGER: James J. Shrager, 21 Norris, McLaughlin and Marcus here representing the 22 deponents. 23 THE VIDEOGRAPHER: The Court reporter 24 today is Patricia Russoniello of Prout and 25 Associates. And would the Court reporter please</p>

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<p>5</p> <p>1 swear in the witness.</p> <p>2 M A N U E L D. M A T I A S, having been duly</p> <p>3 sworn by the Notary, testifies as follows:</p> <p>4 THE VIDEOGRAPHER: Please begin.</p> <p>5 DIRECT EXAMINATION BY MR. CLEMENTS:</p> <p>6 Q. Mr. Matias, my name is Jim Clements.</p> <p>7 I understand that you're here to provide a</p> <p>8 demonstration --</p> <p>9 A. Sure.</p> <p>10 Q. -- on the Lawson Software --</p> <p>11 A. Mm'mm.</p> <p>12 Q. -- system? Okay.</p> <p>13 I'm going to start by asking you a</p> <p>14 few background questions --</p> <p>15 A. Mm'mm.</p> <p>16 Q. -- both about just the deposition in</p> <p>17 general and also the Lawson Software system.</p> <p>18 So we'll go through these questions</p> <p>19 and that should only take a short amount of time</p> <p>20 and then we can get started on the deposition --</p> <p>21 excuse me -- the demonstration.</p> <p>22 Mr. Matias, could you tell us who</p> <p>23 your employer is?</p> <p>24 A. Robert Wood Johnson University</p> <p>25 Hospital.</p>	<p>7</p> <p>1 Q. If you don't understand a question</p> <p>2 that I ask please just tell me that you don't</p> <p>3 understand and I'll try to rephrase it.</p> <p>4 A. Okay.</p> <p>5 Q. Otherwise, I'll assume that you</p> <p>6 understood the question.</p> <p>7 A. No problem.</p> <p>8 Q. Are you represented by counsel today?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And who's that?</p> <p>11 MR. SHRAGER: We just met today.</p> <p>12 THE WITNESS: Correct.</p> <p>13 Q. Okay. All right. So I understand</p> <p>14 that you're represented by James Shrager?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And is there any reason at all</p> <p>17 why you feel you cannot testify fully and accurately</p> <p>18 today?</p> <p>19 A. No, no reason.</p> <p>20 Q. Are you on any medication?</p> <p>21 A. No.</p> <p>22 Q. Okay. Just as a precaution since you</p> <p>23 haven't done a deposition before sometimes Mr.</p> <p>24 Shrager may object to a question that I ask but</p> <p>25 unless he instructs you not to answer, once he</p>
<p>6</p> <p>1 Q. And could you state your home and</p> <p>2 work address, please.</p> <p>3 A. Sure. I live in 3 Liberty Lane in</p> <p>4 Somerset, New Jersey, 08873, and my employer</p> <p>5 address is 1 Robert Wood Johnson Place, New</p> <p>6 Brunswick, New Jersey, 08901.</p> <p>7 Q. Okay. Thank you.</p> <p>8 Mr. Matias, have you ever been</p> <p>9 deposed before?</p> <p>10 A. No.</p> <p>11 Q. Have you ever attended a deposition</p> <p>12 before?</p> <p>13 A. No.</p> <p>14 Q. Okay. I won't have many exhibits to</p> <p>15 show you. I think, in fact, I'll just have one but</p> <p>16 just so that you understand, I'm going to be</p> <p>17 referring to a document that we'll be marking as an</p> <p>18 exhibit and then I'm going to ask you questions</p> <p>19 about that document.</p> <p>20 A. Okay.</p> <p>21 Q. I need your responses to -- to my</p> <p>22 questions to be oral because you just nod your head</p> <p>23 or say uh-huh, it doesn't show up very well in the</p> <p>24 transcript.</p> <p>25 A. Correct.</p>	<p>8</p> <p>1 objects then you can go ahead and answer the</p> <p>2 question.</p> <p>3 A. Okay.</p> <p>4 Q. We can take breaks whenever you want</p> <p>5 them unless there's a pending question. I just ask</p> <p>6 that you go ahead and answer it before we break.</p> <p>7 Do you have any questions about the</p> <p>8 procedures today?</p> <p>9 A. No. No questions.</p> <p>10 Q. Okay. Great.</p> <p>11 All right.</p> <p>12 MR. CLEMENTS: Court Reporter, I</p> <p>13 think you've already marked the first exhibit.</p> <p>14 Q. Mr. Matias, I'm handing you what has</p> <p>15 been marked as Exhibit Number 1. Actually I think</p> <p>16 it's marked as Exhibit RWJ-1.</p> <p>17 MR. SHRAGER: Mm'mm.</p> <p>18 MR. CLEMENTS: Mr. Shrager, there's a</p> <p>19 copy.</p> <p>20 MR. SHRAGER: Thank you.</p> <p>21 Q. Please take a moment to -- to review</p> <p>22 this document.</p> <p>23 MR. CLEMENTS: For the record, these</p> <p>24 are the subpoenas and attached schedules served</p> <p>25 upon Robert Wood Johnson University Hospital by</p>

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<p>9</p> <p>1 plaintiff, ePLUS.</p> <p>2 Q. Have you seen this document before?</p> <p>3 A. No. This is my first time.</p> <p>4 Q. Okay. If you don't mind, if you</p> <p>5 would turn to the back, the final page I think</p> <p>6 should be Schedule C. It's the very last page.</p> <p>7 And it's titled Premises And Things To Be</p> <p>8 Inspected. Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And if you could take a moment just</p> <p>11 to look over those topics. This is what we intend</p> <p>12 to cover during the demonstration and I just want</p> <p>13 to make sure that you understand that you're</p> <p>14 designated to speak on behalf of these topics.</p> <p>15 A. Okay. Correct.</p> <p>16 Q. Okay. Do you understand that you're</p> <p>17 providing testimony on behalf of Robert Wood</p> <p>18 Johnson as if Robert Wood Johnson itself were</p> <p>19 sitting in the chair and giving testimony?</p> <p>20 A. Yes, I understand.</p> <p>21 Q. And are you prepared to testify on</p> <p>22 Robert Wood Johnson's behalf with respect to the --</p> <p>23 to the demonstration of Lawson software?</p> <p>24 A. Yes.</p> <p>25 Q. Mr. Matias, what did you do to</p>	<p>11</p> <p>1 module that we use to go up and bar count the units</p> <p>2 that have bar codes. It's a hand-held technology.</p> <p>3 Q. Okay. And is inventory management,</p> <p>4 is that the same as inventory control?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And does Robert Wood Johnson</p> <p>7 also license Purchase Order?</p> <p>8 A. We use the PO module, yes.</p> <p>9 Q. And does law -- excuse me. Start over.</p> <p>10 Does Robert Wood Johnson license</p> <p>11 Procurement Punch-Out?</p> <p>12 A. No.</p> <p>13 Q. Does Robert Wood Johnson license</p> <p>14 Lawson's EDI software?</p> <p>15 A. Yes. We do use EDI here.</p> <p>16 Q. Okay. Is there any other software</p> <p>17 modules or applications that you're aware of that</p> <p>18 Robert Wood Johnson licensed from Lawson?</p> <p>19 A. Let's see what else. We use add-ins</p> <p>20 to extract and upload data but that's an Excel --</p> <p>21 you know, in conjunction with Excel.</p> <p>22 Q. Were these add-ins provided by</p> <p>23 Lawson?</p> <p>24 A. Yes.</p> <p>25 Q. So does Robert Wood Johnson license</p>
<p>10</p> <p>1 prepare to testify for the demonstration of the</p> <p>2 Lawson software?</p> <p>3 A. I really didn't do anything to</p> <p>4 prepare. I was just coming here to show you the</p> <p>5 operation of the system and answer any questions</p> <p>6 that counsel was going to direct them to me.</p> <p>7 Q. Okay. But you think you're prepared</p> <p>8 to --</p> <p>9 A. Oh, yes.</p> <p>10 Q. -- demonstrate?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Great. Thank you.</p> <p>13 What software does Robert Wood Johnson</p> <p>14 currently use or license from Lawson Software?</p> <p>15 A. Right now we are currently using --</p> <p>16 I'm assuming you're speaking modules?</p> <p>17 Q. Yes. Modules and applications or</p> <p>18 however it is you would refer to them.</p> <p>19 A. Okay. Right now we're using what is</p> <p>20 called RSS, Requisitions Self-Service. It's where</p> <p>21 the end user orders their supplies. We use the</p> <p>22 inventory management tool. It's where all the</p> <p>23 inventory's housed, storeroom, house stock. We</p> <p>24 also use the general ledger, AP and budget module</p> <p>25 and we also use a module called MSCM, and that's a</p>	<p>12</p> <p>1 the Microsoft add-ins from Lawson Software?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Thanks.</p> <p>4 Mr. Matias, do you know how long</p> <p>5 Robert Wood Johnson has licensed Lawson's</p> <p>6 procurement software?</p> <p>7 A. About four months now. We -- we went</p> <p>8 live November 1st.</p> <p>9 Q. And do you understand that when I</p> <p>10 refer to Lawson's procurement software just to make</p> <p>11 sure you understand, I'm referring to the modules</p> <p>12 we just spoke of; specifically, Requisition</p> <p>13 Self-Service, Inventory Control, Purchase Order and</p> <p>14 that would also include EDI?</p> <p>15 A. EDI, yes.</p> <p>16 Q. Okay. Thanks.</p> <p>17 So prior to November 2009 did Robert</p> <p>18 Wood Johnson license any Lawson Software</p> <p>19 applications?</p> <p>20 A. I'm going to assume no because we</p> <p>21 were just in the implementation phase so I'm going</p> <p>22 to assume no.</p> <p>23 Q. Okay. When did the implementation</p> <p>24 begin for the Lawson procurement software?</p> <p>25 A. April? April of 2009.</p>

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<p>1 Q. April of 2009. Okay. Thank you.</p> <p>2 So altogether the implementation took</p> <p>3 roughly -- let's see --</p> <p>4 A. Six months.</p> <p>5 Q. -- seven months?</p> <p>6 A. Seven months, yes.</p> <p>7 Q. Okay. Great. Thanks.</p> <p>8 Has Robert Wood Johnson added or</p> <p>9 removed any specific applications or modules since</p> <p>10 the implementation first began in April 2009?</p> <p>11 A. No.</p> <p>12 Q. Okay. Mr. Matias, are you familiar</p> <p>13 with the term Item Master?</p> <p>14 A. Yes.</p> <p>15 Q. Could you explain what the Item</p> <p>16 Master is?</p> <p>17 A. Sure. Item Master in Lawson is</p> <p>18 called IC 11. It's where we house all of our</p> <p>19 inventory supplies whether it's stock or nonstock</p> <p>20 and that -- that is where the end user on the floor</p> <p>21 gets their information from. It houses the Lawson</p> <p>22 item number, the description, the unit of measure,</p> <p>23 manufacture number.</p> <p>24 Q. And you mentioned the Lawson item</p> <p>25 number. Could you explain what the Lawson item</p>	<p>1 Q. And could you describe the types of</p> <p>2 products that are available in the Lawson</p> <p>3 procurement system?</p> <p>4 A. Sure. We have everything from</p> <p>5 implants to medical/surgical supplies to lab</p> <p>6 supplies to gastroenterologist supplies. We have</p> <p>7 all sorts of screws, bolts, bandages, gauzes, IV</p> <p>8 solutions, reagents, hip implants, stents,</p> <p>9 pacemakers, IC -- AICDs for the pacemakers.</p> <p>10 Q. Okay. That's a pretty good list.</p> <p>11 A. Yeah.</p> <p>12 Q. All right. Thanks.</p> <p>13 Do you know if the Item Master</p> <p>14 contains any computers and accessories?</p> <p>15 A. Computers and accessories? I'm going</p> <p>16 to say maybe. When we converted information from</p> <p>17 our old system it maybe have some computers and</p> <p>18 accessories there but not to my knowledge I don't</p> <p>19 think it's a lot.</p> <p>20 Q. Okay. What about office supplies?</p> <p>21 A. No. Office supplies is held strictly</p> <p>22 on a different portal, Web site.</p> <p>23 Q. Okay. Thanks.</p> <p>24 I can't remember. Did you mention</p> <p>25 clothing as being something that might be in there?</p>
<p>1 number is?</p> <p>2 A. Sure. The Lawson item number is a</p> <p>3 five-digit number that the system automatically</p> <p>4 assigns when we create a new item in the IC 12</p> <p>5 module or stream.</p> <p>6 Q. And do you know how this five-digit</p> <p>7 number gets assigned to each new item that gets</p> <p>8 added to the Item Master?</p> <p>9 A. It's automated. It comes from</p> <p>10 another screen in the PO screen where we have all</p> <p>11 our rules and stats so every item when we click --</p> <p>12 when we click on Add automatically assigns the next</p> <p>13 consecutive number.</p> <p>14 Q. Okay. So regardless of what type of</p> <p>15 item it is, who the vendor is or anything else</p> <p>16 about that item it would just sequentially take --</p> <p>17 A. Correct.</p> <p>18 Q. -- whatever the next number is?</p> <p>19 A. Correct.</p> <p>20 Q. Okay. Thank you.</p> <p>21 Do you know approximately how many</p> <p>22 items are in the Item Master as implemented by</p> <p>23 Robert Wood Johnson?</p> <p>24 A. Right now we have roughly 36,000</p> <p>25 items.</p>	<p>1 A. No. The Item Master only houses</p> <p>2 medical/surgical supply and if they're going to buy</p> <p>3 it more than 12 times during a year, then we add it</p> <p>4 to the Item Master but if they're going to buy like</p> <p>5 a T-shirt for like a department then we don't put</p> <p>6 that in there.</p> <p>7 Q. What about things like medical gowns</p> <p>8 or gloves?</p> <p>9 A. Gowns and gloves, yes, they're in</p> <p>10 there.</p> <p>11 Q. Okay. Could you explain what types</p> <p>12 of data are included about the items that are in</p> <p>13 the Item Master?</p> <p>14 A. Sure. In the Item Master we take and</p> <p>15 put the description.</p> <p>16 Lawson only has 30 characters for the</p> <p>17 Description field so we get creative and if it's a</p> <p>18 suture, you know, we start it with s-u-t and then</p> <p>19 try to fit it in all the dimensions, you know, six</p> <p>20 by whatever centimeters.</p> <p>21 It contains the manufacture number so</p> <p>22 in case we ever call the vendor and we need to</p> <p>23 identify the item to them, we got to give them the</p> <p>24 manufacture number. It contains a unit of measure</p> <p>25 which is usually the unit of measure that is</p>

<p>1 stocked by us and the manufacturer and is usually</p> <p>2 the purchase unit measure so if it's a box, you</p> <p>3 know, we're buying it by the box. If it's an each,</p> <p>4 you know, we're issuing out by the each, we're</p> <p>5 buying by the box, that's all that the Item Master</p> <p>6 has.</p> <p>7 Q. Okay. And when someone -- let me</p> <p>8 start over.</p> <p>9 If a requester wants to purchase a</p> <p>10 particular item or put in a request for that item</p> <p>11 to be purchased would they base their choice of</p> <p>12 which item they need on that item description?</p> <p>13 A. There's a couple of ways that the</p> <p>14 requester could find the item.</p> <p>15 There's a -- a screen called PO 15</p> <p>16 and it's basically -- they're a template so</p> <p>17 whatever items they want to see when they log in we</p> <p>18 put all those items under that template so they</p> <p>19 will only see that template. If the item's not in</p> <p>20 there, then in RSS, requisitional service, they</p> <p>21 could do the search option and search for a</p> <p>22 description, manufacture number, catalog number,</p> <p>23 you know, and then they go narrow, narrow the item</p> <p>24 and pick the one that they want.</p> <p>25 Q. Okay. Great. And PO 15, you</p>	17	<p>1 yes.</p> <p>2 Q. Does your department that you work</p> <p>3 in, do you have a shopping list?</p> <p>4 A. No.</p> <p>5 Q. Oh, you don't have a shopping list.</p> <p>6 A. No.</p> <p>7 Q. That's too bad.</p> <p>8 A. We wouldn't buy a lot of things.</p> <p>9 Q. Mr. Matias, do you know how many</p> <p>10 vendors Robert Wood Johnson uses within the Lawson</p> <p>11 procurement system?</p> <p>12 A. My God. Right off the top of my head</p> <p>13 I'm going to say 3,000.</p> <p>14 Q. And do you know who the largest five</p> <p>15 vendors are that Robert Wood Johnson uses?</p> <p>16 A. I know the number one is Owens Minor.</p> <p>17 Then you have Medtronic. Then you have Synthes --</p> <p>18 Q. Sorry. Could you spell that?</p> <p>19 A. S-y-n-t-h-e-s. And the other two not</p> <p>20 off the top of my head.</p> <p>21 Q. Okay. So is it -- is the vendor</p> <p>22 information associated with items in Item Master</p> <p>23 somehow provided in the system?</p> <p>24 A. The vendor information we get from</p> <p>25 finance -- finance bills the vendor. They tell us</p>
<p>1 referred to a template?</p> <p>2 A. Yes.</p> <p>3 Q. Is that the same as the shopping</p> <p>4 list?</p> <p>5 A. It's the same as the shopping list.</p> <p>6 Q. Do you know if the templates that</p> <p>7 Robert Wood Johnson has in PO 15 would include</p> <p>8 nonstock items?</p> <p>9 A. Yes.</p> <p>10 Q. It does include nonstock items?</p> <p>11 A. Mm'mm.</p> <p>12 Q. Okay. Thanks.</p> <p>13 Do you have some examples of the</p> <p>14 types of items that are included in those shopping</p> <p>15 lists?</p> <p>16 A. Sure. There's only two shopping</p> <p>17 lists that we have now. One is a generic storeroom</p> <p>18 shopping list. It only contains inventory items or</p> <p>19 stock items that are housed in our warehouse. And</p> <p>20 then there's the PO 15 for each individual</p> <p>21 department that contains the nonstock items; stuff</p> <p>22 that's not in the warehouse here.</p> <p>23 Q. So each department at Robert Wood</p> <p>24 Johnson has its own shopping list?</p> <p>25 A. Has its own shopping list template,</p>	18	<p>1 the vendor number and if we build an item, then we</p> <p>2 associate the item in another location called IC 12</p> <p>3 to that vendor.</p> <p>4 Q. Okay. So the vendors are associated</p> <p>5 with -- with items in the Item Master using IC 12?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. And what if a particular item</p> <p>8 has more than one vendor associated with it?</p> <p>9 A. In Lawson it can only have one vendor</p> <p>10 associated to it. Then if we buy that same item</p> <p>11 from another vendor, then there's another screen</p> <p>12 called PO 13.3 that we could associate the same</p> <p>13 Lawson number to multiple vendor item numbers which</p> <p>14 in essence turns out to be different vendors.</p> <p>15 That's a rare occasion.</p> <p>16 Q. Is PO 13.3, is -- do you know what</p> <p>17 that module is called?</p> <p>18 A. That's called the vendor item number.</p> <p>19 Q. So if you were looking at the record</p> <p>20 for a particular item in the Item Master --</p> <p>21 A. Mm'mm.</p> <p>22 Q. -- is there a way to see which</p> <p>23 vendors could be linked to that particular product?</p> <p>24 A. No. You will have to try to run some</p> <p>25 type of report or go into PO 72 and put in the</p>

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<p>21</p> <p>1 Lawson item number and do a search and then you are</p> <p>2 at the mercy of the system if it spits out the</p> <p>3 right information.</p> <p>4 Q. Okay. So what about if you're using</p> <p>5 the Requisition Self-Service module --</p> <p>6 A. Mm'mm.</p> <p>7 Q. -- if you search for a particular</p> <p>8 item by its product description --</p> <p>9 A. Mm'mm.</p> <p>10 Q. -- would you be able to see the same</p> <p>11 item from more than one vendor if that item should</p> <p>12 exist --</p> <p>13 A. No.</p> <p>14 Q. -- associated with more than one</p> <p>15 vendor?</p> <p>16 A. No, because if you put in the</p> <p>17 manufacture number it's only going to bring you</p> <p>18 that Lawson item number. It doesn't show you if</p> <p>19 there's other vendors attached to that Lawson item</p> <p>20 number.</p> <p>21 Q. But let's say you had a particular</p> <p>22 product.</p> <p>23 A. Mm'mm.</p> <p>24 Q. If it had two Lawson item numbers</p> <p>25 even though it was the same product, you did a</p>	<p>23</p> <p>1 don't have any office supplies in your system --</p> <p>2 A. Right, right.</p> <p>3 Q. -- but assuming that you did, then</p> <p>4 how would you go about making it in the Item Master</p> <p>5 such that those paper clips could be ordered from</p> <p>6 either vendor; either Staples or Office Max?</p> <p>7 A. Okay. In -- in the Item Master it</p> <p>8 doesn't have vendor information. It's just like</p> <p>9 the core of the items. It just has a description</p> <p>10 and the unit of measure.</p> <p>11 Then when you move into IC 12 that's</p> <p>12 where you associate the vendor to it so it's</p> <p>13 automatically going to default to whatever vendor</p> <p>14 we have set up there.</p> <p>15 Now, if they want to buy -- let's</p> <p>16 say, Staples is on back order for those paper clips</p> <p>17 and they to buy from Office Depot, then before they</p> <p>18 go search for it, it's not going to show up unless</p> <p>19 we add it into PO 13.3 as another option for that</p> <p>20 same Lawson number and then when it gets to a PO,</p> <p>21 we got to be knowledgeable to change the vendor</p> <p>22 from Staples to Office Depot.</p> <p>23 Q. So you would only have one Lawson</p> <p>24 item number?</p> <p>25 A. For paper clips.</p>
<p>22</p> <p>1 search by that item description, would it show both</p> <p>2 of those items as results of your search?</p> <p>3 A. Yes, but -- so now -- now we start</p> <p>4 getting into the detail.</p> <p>5 So in Lawson you can have many Lawson</p> <p>6 item numbers but only one vendor item number. So</p> <p>7 the vendor item number, it's what goes out on a PO</p> <p>8 either fax, EDI, E-mail, whenever we send it out.</p> <p>9 So if you try to add another vendor item number,</p> <p>10 the system -- there's an error. You know, hey.</p> <p>11 This item number already existed to this Lawson</p> <p>12 item number so you can't add another one but you</p> <p>13 can have many Lawson numbers to one vendor item</p> <p>14 number if you, you know, manipulate the system, add</p> <p>15 a dash, put a period, you know, take out the last</p> <p>16 number but it doesn't have -- it doesn't allow you</p> <p>17 to have multiple like duplicates.</p> <p>18 Q. I see. If you -- say, for instance,</p> <p>19 if Robert Wood Johnson wanted to order a box of</p> <p>20 paper clips --</p> <p>21 A. Mm'mm.</p> <p>22 Q. -- and they could order it from</p> <p>23 Staples or, say, Office Max --</p> <p>24 A. Mm'mm.</p> <p>25 Q. -- realizing I know that you say you</p>	<p>24</p> <p>1 Q. For paper clips. But you would have</p> <p>2 two vendor items associated with --</p> <p>3 A. Right.</p> <p>4 Q. -- that one item?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And when you did a search for</p> <p>7 the item the way I understand you explained it, you</p> <p>8 would only see the item pop up associated with one</p> <p>9 of the two vendors?</p> <p>10 A. The primary vendor, right.</p> <p>11 Q. The primary vendor. How is that</p> <p>12 primary vendor designated?</p> <p>13 A. In IC 12. When -- and I'll show you</p> <p>14 when we get into the system. There's a source</p> <p>15 button that you have to pick a vendor to the item.</p> <p>16 Q. Okay. And at what point would you be</p> <p>17 able to switch from that primary vendor to the --</p> <p>18 A. Secondary.</p> <p>19 Q. -- secondary vendor?</p> <p>20 A. In PO 13.3 you have a capability of</p> <p>21 marking one of the items as the default so whenever</p> <p>22 the PO gets created it automatically puts that</p> <p>23 vendor item number instead of the other one.</p> <p>24 Q. But could you also select a different</p> <p>25 vendor as you're building the requisition?</p>

<p>25</p> <p>1 A. They are -- the end users are able to</p> <p>2 select a vendor. If they're building a requisition</p> <p>3 like from scratch, the item already does not exist</p> <p>4 in the Item Master but if it already exists in the</p> <p>5 Item Master they can't select another vendor. We</p> <p>6 have to change the PO before it goes out.</p> <p>7 Q. So there's no way for the requester</p> <p>8 to select the secondary vendor as they're creating</p> <p>9 the requisition?</p> <p>10 A. Correct.</p> <p>11 Q. Okay. Thank you.</p> <p>12 All right. Mr. Matias, I apologize</p> <p>13 if we're covering a little old ground here --</p> <p>14 A. No, no.</p> <p>15 Q. -- but I want to make sure we cover</p> <p>16 everything so...</p> <p>17 A. No problem.</p> <p>18 Q. How -- how does a requester go about</p> <p>19 finding product items in the Lawson procurement</p> <p>20 system?</p> <p>21 A. Okay. So the requester only has</p> <p>22 access to requisitions of service. You know, when</p> <p>23 they log in, all their information populates. You</p> <p>24 know, the accounting, you know, the cost center,</p> <p>25 where the supplies are going to get charged to.</p>	<p>27</p> <p>1 Q. Mr. Matias, are you familiar with the</p> <p>2 requisitions module?</p> <p>3 A. In Lawson?</p> <p>4 Q. Yes.</p> <p>5 A. I know there's an RQ 10 --</p> <p>6 Q. Yes.</p> <p>7 A. -- but we could build a requisition</p> <p>8 from scratch, yes.</p> <p>9 Q. Yes. So does Robert Wood Johnson</p> <p>10 have the ability to use RQ 10 to create a</p> <p>11 requisition?</p> <p>12 A. We do but we don't have -- we don't</p> <p>13 give the end users access to it. It's more</p> <p>14 complicated.</p> <p>15 Q. I see. So the typical requester of</p> <p>16 Robert Wood Johnson would not have access to RQ 10?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. But if -- if, say, for</p> <p>19 instance, you wanted to put in a request for an</p> <p>20 item could you use the RQ 10 module --</p> <p>21 A. Yes.</p> <p>22 Q. -- to search for particular items?</p> <p>23 A. Not search. Just to create a req.</p> <p>24 RQ 10 does not have the capability of searching.</p> <p>25 Q. Does the RQ 10 module have the</p>
<p>26</p> <p>1 They have a couple options.</p> <p>2 They go into their shopping list</p> <p>3 which is the PO 15 that's already created and if</p> <p>4 another Lawson number item, they just search for</p> <p>5 the Lawson item number. If they don't have any</p> <p>6 information, they go into another option that's the</p> <p>7 search button and -- and it searches the entire</p> <p>8 Item Master. They could put in the Lawson number.</p> <p>9 They could put our old inventory number from our</p> <p>10 old system because we carry that over. They can</p> <p>11 put a manufacture number. A word. Let's say</p> <p>12 they're searching for gloves. You can put glove</p> <p>13 and everything that contains that word glove will</p> <p>14 come up and then they have to, you know, narrow the</p> <p>15 search by picking up the one that they really want</p> <p>16 and that's how they search for an item.</p> <p>17 Q. Okay. And when you're talking about</p> <p>18 the requester performing this search would this all</p> <p>19 be done within Requisition Self-Service?</p> <p>20 A. Yes.</p> <p>21 Q. Could a requester also use a</p> <p>22 requisitions module to do this?</p> <p>23 MR. GRAHAM: Objection. Foundation.</p> <p>24 A. A requisition module? Explain that</p> <p>25 to me.</p>	<p>28</p> <p>1 ability to drill around?</p> <p>2 A. After you put in your item number, yes.</p> <p>3 Q. Okay. But you could not drill around</p> <p>4 to use that feature to find --</p> <p>5 A. I --</p> <p>6 Q. -- particular items --</p> <p>7 A. Correct.</p> <p>8 Q. -- or item description?</p> <p>9 A. Correct. RSS is more Web-based. RQ</p> <p>10 10 is more, you know, data-driven. You enter every</p> <p>11 single information into it.</p> <p>12 Q. Okay. So within Requisition</p> <p>13 Self-Service could you tell me which of the search</p> <p>14 functions that Robert Wood Johnson has available</p> <p>15 for its requesters?</p> <p>16 A. It's just -- it's -- when you go into</p> <p>17 the Requisition Self-Service at the top of the</p> <p>18 button it has just the word search and you click on</p> <p>19 search, another screen pops up with a little field</p> <p>20 and you get to type in whatever information you</p> <p>21 want to type in to search.</p> <p>22 Q. Okay. And you also said that there</p> <p>23 was an option for the shopping list?</p> <p>24 A. Mm'mm.</p> <p>25 Q. Is there also an option for something</p>

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<p>29</p> <p>1 called categories?</p> <p>2 A. I'm not familiar with categories.</p> <p>3 Q. Are you familiar with something</p> <p>4 referred to as UNSPSC codes?</p> <p>5 A. Yes.</p> <p>6 Q. Does Robert Wood Johnson use UNSPSC</p> <p>7 codes?</p> <p>8 A. No.</p> <p>9 Q. So Robert Wood Johnson doesn't have</p> <p>10 any UNSPSC codes designated for the items --</p> <p>11 A. Correct.</p> <p>12 Q. -- in the Item Master?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. Thanks.</p> <p>15 Mr. Matias, are you familiar with the</p> <p>16 advance search functionality within the Lawson</p> <p>17 procurement system?</p> <p>18 A. I guess it depends where advance</p> <p>19 search will be located in.</p> <p>20 Q. Are you familiar with the Advance</p> <p>21 Search feature within the Requisition Self-Service</p> <p>22 application?</p> <p>23 A. Yes.</p> <p>24 Q. And is that enabled on the Robert</p> <p>25 Wood Johnson implementation?</p>	<p>31</p> <p>1 Master?</p> <p>2 A. Within the Item Master.</p> <p>3 Q. Are there any other databases that</p> <p>4 would be searched for matching key words?</p> <p>5 A. Not that I'm aware of.</p> <p>6 Q. Okay. Do you know if Robert Wood</p> <p>7 Johnson employs any user define search fields?</p> <p>8 A. No.</p> <p>9 Q. Do you mean that you don't know or</p> <p>10 that --</p> <p>11 A. No, that --</p> <p>12 Q. -- Robert Wood Johnson does not?</p> <p>13 A. Does not.</p> <p>14 Q. What about -- you referred to a</p> <p>15 legacy sort of item number that was associated with</p> <p>16 the old system.</p> <p>17 A. Okay.</p> <p>18 Q. Did you say that you could also</p> <p>19 search by that number?</p> <p>20 A. Yes.</p> <p>21 Q. And is that -- is that a particular</p> <p>22 user-defined field that Robert Wood Johnson has set</p> <p>23 up within Item Master?</p> <p>24 A. That's also within the Item Master.</p> <p>25 It's in a user field but I don't know if it's</p>
<p>30</p> <p>1 A. Yes. And that's where the end user</p> <p>2 searches, you know, like I explained before, the</p> <p>3 items.</p> <p>4 Q. And could you explain how the Advance</p> <p>5 Search feature works?</p> <p>6 A. Sure. When the end user logs into</p> <p>7 RSS, you know, all the -- their fields already</p> <p>8 populated. Then on the top, you know, you click on</p> <p>9 advance search and that's where you type in the</p> <p>10 Lawson item number, the description, you know,</p> <p>11 glove, you know, the manufacture number and</p> <p>12 anything that contains -- whatever you typed in</p> <p>13 there pops up on your screen and that's where you</p> <p>14 have to, you know, pick the right item that you</p> <p>15 want to order.</p> <p>16 Q. Okay. And do you know what -- excuse</p> <p>17 me. Let me start over.</p> <p>18 Do you know what fields are enabled</p> <p>19 in the Search feature within the implementation of</p> <p>20 Lawson's procurement system?</p> <p>21 A. I think everything is enabled.</p> <p>22 They -- they pretty much put anything in it. It</p> <p>23 searches everything.</p> <p>24 Q. And when you say searches everything</p> <p>25 do you mean everything that's within the Item</p>	<p>32</p> <p>1 called user define but it's in IC 11. I have to</p> <p>2 show you that but when they do advance search if</p> <p>3 they put that item number, it also searches that.</p> <p>4 Q. I see. And what's the -- what's the</p> <p>5 title of the field called that is associated with</p> <p>6 that number?</p> <p>7 A. I think it's just user field 1.</p> <p>8 Q. And are there any other user fields</p> <p>9 similarly titled that Robert Wood Johnson uses?</p> <p>10 A. In procurement I think that's just</p> <p>11 the only field that we -- we've used for the old</p> <p>12 item number.</p> <p>13 Q. Okay. Do you know if there's any</p> <p>14 search fields within the Lawson procurement system</p> <p>15 that have been disabled by Robert Wood Johnson?</p> <p>16 A. Not that I'm aware of, no.</p> <p>17 Q. Mr. Matias, can you briefly explain</p> <p>18 how purchase orders are generated using Lawson's</p> <p>19 procurement software?</p> <p>20 A. Mm'mm. Okay. So the purchase orders</p> <p>21 are generated when the user goes into requisitions</p> <p>22 of service, they find their item. You know, they</p> <p>23 put their quantity in. They hit check-out. Our</p> <p>24 buyers are instructed to pull down those orders at</p> <p>25 ten o'clock in the morning and at 2:30 in the</p>

<p>33</p> <p>1 afternoon. They run what is called PO 100 so every</p> <p>2 requisition that's sitting out there puts it into a</p> <p>3 PO and that's how it gets created.</p> <p>4 Q. Okay. And how does that purchase</p> <p>5 order actually get transmitted to Robert Wood</p> <p>6 Johnson's vendors?</p> <p>7 A. Sure. So after the buyer runs PO</p> <p>8 100, they get a report of all the POs that were</p> <p>9 created. They go in and verify the pricing and</p> <p>10 everything's correct. Once they're done, on the</p> <p>11 top right-hand corner there's a release function.</p> <p>12 You click release and depending on how we have it</p> <p>13 set up in the back end, either EDI or fax or, you</p> <p>14 know, E-mail the system automatically knows how to</p> <p>15 send those POs out. You know, they have to run</p> <p>16 another -- we have it set up to automatically run</p> <p>17 another job called PO 120 that gathers all the POs</p> <p>18 and then another job that's run, ED 501, if it's an</p> <p>19 EDI and that's also scheduled to run and that's how</p> <p>20 it goes out.</p> <p>21 Q. So EDI is one of the options for</p> <p>22 actually transmitting the purchase orders --</p> <p>23 A. Mm'mm.</p> <p>24 Q. -- to the vendors?</p> <p>25 And do you know about what percentage</p>	<p>35</p> <p>1 of each.</p> <p>2 If it's a fax, then the buyers have a</p> <p>3 common code that says please fax or acknowledge,</p> <p>4 you know, to our office or E-mail me or</p> <p>5 acknowledgment so we know that you got the PO.</p> <p>6 Q. Okay. So could you explain what</p> <p>7 GHX's role is --</p> <p>8 A. Sure.</p> <p>9 Q. -- in submitting the purchase orders?</p> <p>10 A. GHX is like a -- a middleman</p> <p>11 repository for -- for mostly all healthcare</p> <p>12 facilities in the United States.</p> <p>13 It's basically -- they're the ones</p> <p>14 controlling like the partner set-up, you know, with</p> <p>15 the vendor. They're the ones setting up all the ED</p> <p>16 transactions and then they just feed us the</p> <p>17 information to make it easier for us instead of</p> <p>18 going to every single vendor to get their EDI</p> <p>19 information.</p> <p>20 Q. Okay. So any time Robert Wood</p> <p>21 Johnson transmits a purchase order via EDI they're</p> <p>22 actually sending it to GHX?</p> <p>23 A. X. And GHX sends it to the vendor.</p> <p>24 Q. I see. And then the vendor in return</p> <p>25 would --</p>
<p>34</p> <p>1 of purchase orders get transmitted by virtue of the</p> <p>2 EDI?</p> <p>3 A. I'm going to say 75 percent.</p> <p>4 Q. Okay. And does Robert Wood Johnson's</p> <p>5 vendors provide information on whether the items</p> <p>6 ordered in these purchase orders are actually in</p> <p>7 inventory once the purchase order's transmitted?</p> <p>8 A. Rephrase that for me. Do you mean do</p> <p>9 they give us acknowledgment if they received the</p> <p>10 order and they have the item?</p> <p>11 Q. Yes. Exactly.</p> <p>12 Do they provide any sort of</p> <p>13 information about the availability of the items --</p> <p>14 A. Yes.</p> <p>15 Q. -- in the purchase order?</p> <p>16 A. Yes. We are contracted with this</p> <p>17 company called Global Healthcare Exchange, GHX for</p> <p>18 short, and anything that's EDI -- you know, the</p> <p>19 vendor has to be a partner of GHX so whenever we</p> <p>20 set up an EDI vendor we get the information from</p> <p>21 GHX so when we transmit our POs, you know, it's</p> <p>22 realtime. The buyer could log on -- log into that</p> <p>23 portal of GHX and check the acknowledgment of the</p> <p>24 vendor; it's on back order, you know, the price</p> <p>25 changed, the unit of measure should be box instead</p>	<p>36</p> <p>1 A. Send it --</p> <p>2 Q. -- send something back --</p> <p>3 A. -- to GHX --</p> <p>4 Q. -- to GHX --</p> <p>5 A. -- and then we go look at it online.</p> <p>6 Q. Okay. Great. So if the vendor</p> <p>7 provides information on the availability of items --</p> <p>8 A. Mm'mm.</p> <p>9 Q. -- how is that done?</p> <p>10 A. I don't know how they do it to GHX,</p> <p>11 but we just -- when we log into the Web site we</p> <p>12 just see our PO number and the lines that were in</p> <p>13 the PO and if it's wrong it has a red line through</p> <p>14 the item or through where the discrepancy is and we</p> <p>15 try to fix that before the shipment comes in.</p> <p>16 Q. When you say there's a line for the</p> <p>17 discrepancy, that designates that the item is not</p> <p>18 available from that vendor?</p> <p>19 A. If the item's not available it tells</p> <p>20 us right there; back order.</p> <p>21 Q. Okay.</p> <p>22 A. But if it's a red line, you know,</p> <p>23 either the unit of measure was wrong, we send in</p> <p>24 each and they're saying it's supposed to be box or</p> <p>25 the catalog number was wrong. You know, we send a</p>

<p>37</p> <p>1 one and they're saying, no. It's supposed to be</p> <p>2 one, two, three; stuff like that.</p> <p>3 Q. And is that acknowledgment sent via</p> <p>4 EDI?</p> <p>5 A. No.</p> <p>6 Q. It's not?</p> <p>7 A. No.</p> <p>8 Q. How do you receive the information on</p> <p>9 the availability?</p> <p>10 A. We have to go into that portal, GHX,</p> <p>11 to that Web site.</p> <p>12 Q. Oh, I see. So you're actually</p> <p>13 logging onto GHX's --</p> <p>14 A. Web site.</p> <p>15 Q. -- Web site.</p> <p>16 A. Mm'mm.</p> <p>17 Q. And do you know how GHX receives that</p> <p>18 information from the vendor?</p> <p>19 A. I'm assuming they're getting an A 55</p> <p>20 transaction.</p> <p>21 Q. Okay. Is there any information</p> <p>22 that's provided by GHX to Robert Wood Johnson via</p> <p>23 EDI?</p> <p>24 A. No. The only -- the only thing that</p> <p>25 we get from -- what -- EDI is very broad so there's</p>	<p>39</p> <p>1 A. Sure.</p> <p>2 Q. It doesn't have to be expensive. In</p> <p>3 fact, we'd like to keep it inexpensive and --</p> <p>4 MR. IRWIN: An implant would be good.</p> <p>5 THE WITNESS: How about a stent?</p> <p>6 Q. Something that's -- similar items</p> <p>7 that would be available from either different</p> <p>8 vendors or different manufacturers --</p> <p>9 A. Okay.</p> <p>10 Q. -- is the type of items we're looking</p> <p>11 for and we'd -- I need it to be items that are</p> <p>12 nonstock items --</p> <p>13 A. Mm'mm.</p> <p>14 Q. -- that is, not in the inventory --</p> <p>15 A. Inventory.</p> <p>16 Q. -- of Robert Wood Johnson.</p> <p>17 So do you have any ideas about some</p> <p>18 items that we might search? I mean, I've got some</p> <p>19 ideas of my own but they're probably not as good as</p> <p>20 the ideas that you would have so...</p> <p>21 A. So you want nonstock items,</p> <p>22 inexpensive items.</p> <p>23 I mean, we could search for stents.</p> <p>24 We could search for reagents which -- which is the</p> <p>25 lab. Pretty much everything in nonstock. I'm</p>
<p>38</p> <p>1 like a lot of transactions. You have A 50s which</p> <p>2 is the PO going out, A 55 is the order</p> <p>3 acknowledgment, A 32s are catalog or pricing. Then</p> <p>4 you have A 10s which is electronic invoicing. We</p> <p>5 do get A 10s from GHX for one vendor.</p> <p>6 Q. Okay.</p> <p>7 MR. IRWIN: What did you say, Andy?</p> <p>8 A 10s?</p> <p>9 THE WITNESS: A 10s.</p> <p>10 Q. Okay. I think we're ready to go</p> <p>11 ahead and -- and start the demo.</p> <p>12 A. Okay.</p> <p>13 Q. Just a few background questions on</p> <p>14 the demo.</p> <p>15 A. Mm'mm.</p> <p>16 Q. Is this going to be a live system</p> <p>17 that we're using?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And as I explained to -- to</p> <p>20 Mr. Shrager, what we'd like to see in the</p> <p>21 demonstration -- what I'd like to see in the</p> <p>22 demonstration is -- is I'd like to be able to</p> <p>23 search for some items --</p> <p>24 A. Mm'mm.</p> <p>25 Q. -- small ticket items.</p>	<p>40</p> <p>1 not -- I don't know entire Item Master so you would</p> <p>2 have to tell me what type of items you want to</p> <p>3 search and then we just search; see what comes up.</p> <p>4 Q. Do you have any ideas for items that</p> <p>5 might not be as medically specific; that is to say,</p> <p>6 some examples would be like diapers or mops or more</p> <p>7 every-day items?</p> <p>8 A. Most of those every-day items are in</p> <p>9 the storeroom. Diapers we have in the storeroom.</p> <p>10 Mops we don't order through Lawson. Like all those</p> <p>11 inexpensive every-day items are in our warehouse.</p> <p>12 Bandages, gauze, solution, tape.</p> <p>13 Q. Yeah. Makes sense. It's more</p> <p>14 efficient that way?</p> <p>15 A. Right. And everybody uses it.</p> <p>16 Q. Okay.</p> <p>17 A. Like nonstock is pretty much for</p> <p>18 those high-ticket items; you know, pacemakers,</p> <p>19 stents, reagents.</p> <p>20 Q. And could you explain --</p> <p>21 MR. IRWIN: Do you need a new</p> <p>22 computer, Manny?</p> <p>23 THE WITNESS: We'll go to a new</p> <p>24 computer.</p> <p>25 Q. Can you explain what -- some examples</p>

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<p>41</p> <p>1 of reagents and what those are?</p> <p>2 A. Reagents are -- are the chemicals</p> <p>3 used in the labs when you guys -- when people --</p> <p>4 patients come in to get blood drawn, you know,</p> <p>5 depending on what type of tests they're running</p> <p>6 they have to, you know, put a chemical so they</p> <p>7 could run and I guess find the results.</p> <p>8 Q. Okay. And in addition to being</p> <p>9 nonstock you think some of these reagents might be</p> <p>10 purchased from different vendors or else they might</p> <p>11 be made by different manufacturers?</p> <p>12 A. They might be made by different</p> <p>13 manufacturers. See, most of our stuff comes</p> <p>14 through distribution so, you know, Owens and Minor</p> <p>15 is our primary distributor so whatever we order</p> <p>16 from them, if they don't have it, they sub it in</p> <p>17 for us and then they tell us that they're subbing</p> <p>18 it in.</p> <p>19 Q. Okay. And one final question by way</p> <p>20 of background.</p> <p>21 Do you know if Robert Wood Johnson</p> <p>22 uses something called substitute vendor items; PO</p> <p>23 26.6?</p> <p>24 A. No.</p> <p>25 Q. No?</p>	<p>43</p> <p>1 I have access to every single cost center but the</p> <p>2 end user, their information already defaults in</p> <p>3 here so if they were ordering stuff out of the</p> <p>4 storeroom they would leave this field the way it</p> <p>5 is; STKRM. If they were going to order nonstock</p> <p>6 supplies, they will have to change it to purch.</p> <p>7 Q. Once you change that to purch does</p> <p>8 that mean any search results we get will be</p> <p>9 nonstock items or not necessarily?</p> <p>10 A. Not necessarily. It means that any</p> <p>11 search you get and you add it to your cart is going</p> <p>12 to create a PO. It's not going to come out of</p> <p>13 inventory.</p> <p>14 Q. Sorry. Could you explain that again?</p> <p>15 A. Any -- any search we do and if we</p> <p>16 select the item and put it into our shopping cart</p> <p>17 is going to create a PO. It's not going to come</p> <p>18 out of inventory.</p> <p>19 Q. So even if it's an item that is an</p> <p>20 inventory item --</p> <p>21 A. We still see it here.</p> <p>22 Q. -- it would still create a purchase</p> <p>23 order?</p> <p>24 A. Correct, because we're selecting</p> <p>25 purch.</p>
<p>42</p> <p>1 A. Not aware of that.</p> <p>2 Q. Okay. All right.</p> <p>3 Okay. So if we could, Mr. Matias, if</p> <p>4 you could go ahead and log onto --</p> <p>5 A. Sure.</p> <p>6 Q. -- the Lawson portal.</p> <p>7 (Pause.)</p> <p>8 A. Okay.</p> <p>9 Q. And could you go ahead and show us</p> <p>10 the options for searching for product items.</p> <p>11 A. Okay. So -- so whenever end user</p> <p>12 logs in they only see this part of Requisition</p> <p>13 Self-Service. They will click on the shopping</p> <p>14 button here.</p> <p>15 Q. Okay.</p> <p>16 A. This is essentially their main page</p> <p>17 or their home page.</p> <p>18 Q. Okay.</p> <p>19 A. All this information here is already</p> <p>20 populated. This is the cost center that they're</p> <p>21 going to be charging those supplies to so right now</p> <p>22 I'm just going to change it to the OR because the</p> <p>23 OR has more stuff than I do.</p> <p>24 Then they have to come here and do</p> <p>25 detail profile. I'm going to click on Save because</p>	<p>44</p> <p>1 Q. I see. So, for instance, just to</p> <p>2 make sure I'm clear on this --</p> <p>3 A. Mm'mm.</p> <p>4 Q. -- so you said that most of the sort</p> <p>5 of every-day items are kept in inventory.</p> <p>6 A. Correct.</p> <p>7 Q. But now that you've selected purch</p> <p>8 there --</p> <p>9 A. Mm'mm.</p> <p>10 Q. -- if we select one of those items as</p> <p>11 a requester it's actually going to order that item</p> <p>12 off site from whomever the vendor is?</p> <p>13 A. Order the item from a vendor.</p> <p>14 Q. Okay. Well, I think that's going</p> <p>15 to -- that in itself should provide the</p> <p>16 functionality that we want to see because the</p> <p>17 problem I have with using inventory items is that</p> <p>18 it won't generate a purchase order normally --</p> <p>19 A. Correct.</p> <p>20 Q. -- if you get it from inventory so I</p> <p>21 think this would -- this would solve that problem</p> <p>22 so --</p> <p>23 A. Okay.</p> <p>24 Q. -- that -- that's very good.</p> <p>25 A. Okay. So -- so this is it. And then</p>

<p>45</p> <p>1 up here where it says Find Shop, I'm assuming this</p> <p>2 is the advance search that we were talking about,</p> <p>3 this search catalog. Just brings up this other</p> <p>4 field here and you could search anything.</p> <p>5 Q. Okay. All right. Great.</p> <p>6 So could you type in a description of</p> <p>7 a reagent that is normally used by Robert Wood</p> <p>8 Johnson.</p> <p>9 A. Mm'mm. And then...</p> <p>10 Q. Okay. We only got three results</p> <p>11 there.</p> <p>12 A. Right. Because that whole word</p> <p>13 reagent, you know, matches this.</p> <p>14 We have some abbreviation for</p> <p>15 reagent. I think it's...</p> <p>16 So you can see it came more. Like I</p> <p>17 said, Lawson only -- the description only holds 30</p> <p>18 characters so it depends on who enters it.</p> <p>19 Q. I see.</p> <p>20 A. We try to be reage -- like the noun,</p> <p>21 you know, reagent, so RGT. So this -- this came up</p> <p>22 more items.</p> <p>23 Q. Okay. And so how many items does it</p> <p>24 say you got as a result? I can't see it. Sorry.</p> <p>25 A. I don't even know if it tells me how</p>	<p>47</p> <p>1 Q. Okay. Yeah. Just -- if you could</p> <p>2 just kind of slowly scroll down.</p> <p>3 A. Sure.</p> <p>4 (Pause.)</p> <p>5 Q. Some of these reagents are pretty</p> <p>6 expensive.</p> <p>7 A. Mm'mm.</p> <p>8 Q. I'm going to go over my hundred</p> <p>9 dollar limit.</p> <p>10 A. Do gown?</p> <p>11 Q. Okay. Let's try gown.</p> <p>12 (Pause.)</p> <p>13 Q. Okay. When some of these gowns don't</p> <p>14 have a price shown with them what does that mean?</p> <p>15 A. That means that we haven't ordered it</p> <p>16 and it also means that we haven't -- we don't have</p> <p>17 a contract in place and we don't have pricing</p> <p>18 loaded in PO 25. That's another screen of Lawson.</p> <p>19 Q. So would you be able to order the</p> <p>20 item if it doesn't have a price?</p> <p>21 A. The end user has to put a -- at least</p> <p>22 a penny price and then when we get it downstairs in</p> <p>23 purchasing it goes into like an error que, PO 23,</p> <p>24 and the buyer has to figure out the price; either</p> <p>25 calling up the vendor or, you know, researches it</p>
<p>46</p> <p>1 many items.</p> <p>2 Q. Is there any way to make that window</p> <p>3 bigger so that we could see the whole width of it</p> <p>4 at once?</p> <p>5 A. I mean, that's the --</p> <p>6 Q. No?</p> <p>7 A. That's the high that it -- I cannot</p> <p>8 make it bigger.</p> <p>9 Q. Okay.</p> <p>10 A. How about that way?</p> <p>11 Q. Yeah. I think that's -- that's</p> <p>12 pretty good right there. Yeah. That's better.</p> <p>13 (Pause.)</p> <p>14 A. I don't think it gives you an amount.</p> <p>15 Q. Okay. Well, that's fine.</p> <p>16 Could you go back to the top of the</p> <p>17 list?</p> <p>18 A. I'll go back to previous. Start from</p> <p>19 the beginning.</p> <p>20 Q. Is there any way that we could see</p> <p>21 more items at once? Because right now all we can</p> <p>22 see is like three items. Is there a way to make it</p> <p>23 smaller, to make it...</p> <p>24 A. I mean, I can scroll down for you. I</p> <p>25 don't --</p>	<p>48</p> <p>1 in our old system --</p> <p>2 Q. Oh, I see.</p> <p>3 A. -- through the old system.</p> <p>4 Q. Okay. Okay. So if you could scroll</p> <p>5 back up toward the top again.</p> <p>6 Okay. Could you stop right there?</p> <p>7 Sorry. And could you click on the 10616.</p> <p>8 A. 616. Okay.</p> <p>9 Q. Sorry. Could you click on it such</p> <p>10 that we could see the item description?</p> <p>11 MR. IRWIN: You want a zero price</p> <p>12 one? You don't really want a zero price one.</p> <p>13 MR. CLEMENTS: No, I don't want a</p> <p>14 zero price one. I think -- yeah.</p> <p>15 MR. IRWIN: Just do the next one</p> <p>16 down.</p> <p>17 THE WITNESS: Well, this one's \$50 a</p> <p>18 case.</p> <p>19 MR. SHRAGER: This says \$50 on it.</p> <p>20 MR. IRWIN: Oh. I thought it was</p> <p>21 dollar sign zero.</p> <p>22 THE WITNESS: No. This is \$50 a case.</p> <p>23 Q. Okay. And I see it says the source</p> <p>24 vendor there is Abaline Supplies?</p> <p>25 A. Abaline Supplies.</p>

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<p>49</p> <p>1 Q. Abaline Supplies. And that's the --</p> <p>2 that's the vendor, not the manufacturer?</p> <p>3 A. Correct.</p> <p>4 Q. Is there a way to see who the</p> <p>5 manufacturer is for this one?</p> <p>6 A. Not here.</p> <p>7 Q. Is there somewhere you could see who</p> <p>8 the manufacturer is? I'm not asking you to do it</p> <p>9 right now --</p> <p>10 A. Okay.</p> <p>11 Q. -- but is there a way to do it?</p> <p>12 A. I would have to go out and look at</p> <p>13 another screen but this is what the end user sees</p> <p>14 only. Like if it's a distributor, it doesn't tell</p> <p>15 you who the manufacturer is.</p> <p>16 Q. I see.</p> <p>17 A. But this is the vendor.</p> <p>18 Q. Is there a way to see -- let me back</p> <p>19 up.</p> <p>20 Are there codes associated with the</p> <p>21 manufacturers in the Item Master?</p> <p>22 A. It -- it would not mean anything to</p> <p>23 the -- to the end user. Only to us.</p> <p>24 Q. Right. But -- but there are codes</p> <p>25 associated with manufacturers?</p>	<p>51</p> <p>1 Q. -- manufacturer or who the code is</p> <p>2 for that manufacturer?</p> <p>3 A. Correct. Not here but this gown</p> <p>4 comes from this vendor.</p> <p>5 Q. Okay. All right. Could you go back</p> <p>6 to the search results again and let's look at some</p> <p>7 of the other gowns that were available there.</p> <p>8 A. Sure.</p> <p>9 (Pause.)</p> <p>10 A. Okay. It's thinking now.</p> <p>11 (Pause.)</p> <p>12 MR. IRWIN: Stuck.</p> <p>13 THE WITNESS: Stuck. It's connected.</p> <p>14 Q. All right. So it's locked up on you?</p> <p>15 A. Yeah. Hold on.</p> <p>16 MR. SHRAGER: Try search?</p> <p>17 THE WITNESS: No. I can't even close</p> <p>18 the screen.</p> <p>19 I apologize. I'm on a wireless</p> <p>20 network here. Sometimes wireless could be...</p> <p>21 (Pause.)</p> <p>22 MR. IRWIN: Manny, you should order a</p> <p>23 new computer for yourself. You're on a B card? A</p> <p>24 wireless card?</p> <p>25 THE WITNESS: I have connection.</p>
<p>50</p> <p>1 A. In the vendor item -- for example,</p> <p>2 Owens and Minor. If we buy something from -- from</p> <p>3 a company called Smith's Medical. We get all our</p> <p>4 syringes and needles. All their numbers start with</p> <p>5 like 0725. That tells them that that's the vendor</p> <p>6 number that they're getting it from.</p> <p>7 Q. Sorry. That 0725 is associated with</p> <p>8 the vendor or with the manufacturer?</p> <p>9 A. With the manufacturer on their end.</p> <p>10 Q. And that's just a prefix shown with</p> <p>11 the actual item number or is that four-digit code</p> <p>12 actually the manufacturer's code?</p> <p>13 A. That's the -- that's the manufacturer</p> <p>14 vendor number to Owens and Minor.</p> <p>15 Q. I see. So if it were a different</p> <p>16 vendor they could possibly have a different number</p> <p>17 for that same manufacturer?</p> <p>18 A. If it's a different vendor.</p> <p>19 Q. Yes.</p> <p>20 A. Yes.</p> <p>21 Q. Okay.</p> <p>22 A. Different number.</p> <p>23 Q. But there's no way to see on here who</p> <p>24 the --</p> <p>25 A. It -- if it's --</p>	<p>52</p> <p>1 (Pause.)</p> <p>2 THE WITNESS: Let's try this again.</p> <p>3 (Pause.)</p> <p>4 MR. IRWIN: What's Ryan's extension?</p> <p>5 THE WITNESS: 2811.</p> <p>6 MR. IRWIN: Let me call and see if</p> <p>7 they have an issue with the system itself.</p> <p>8 THE VIDEOGRAPHER: Want to go off the</p> <p>9 record for a second?</p> <p>10 MR. CLEMENTS: Sure. You want to go</p> <p>11 off the record?</p> <p>12 THE VIDEOGRAPHER: Going off the</p> <p>13 record. The time is 11:59.,</p> <p>14 (Recess taken at 11:59 a.m.)</p> <p>15 THE VIDEOGRAPHER: Back on the</p> <p>16 record. The time is twelve o'clock.</p> <p>17 A. It came up. Let's see. Let's go</p> <p>18 back to...</p> <p>19 Q. Okay. So the one we looked at before</p> <p>20 was 10616. Is that right?</p> <p>21 A. Mm'mm.</p> <p>22 Q. And could you scroll down just a</p> <p>23 little bit.</p> <p>24 A. Here.</p> <p>25 Q. Could you click on the 10619. View</p>

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<p>53</p> <p>1 the item detail for that one. Okay. So here we</p> <p>2 have -- the vendor is Owens and Minor.</p> <p>3 A. Mm'mm. I'm trying to see if it gives</p> <p>4 you more information. Here you go. Okay.</p> <p>5 Q. Okay. So here it does provide</p> <p>6 manufacturer code?</p> <p>7 A. Right.</p> <p>8 Q. And could you explain what the</p> <p>9 difference between the code number and the numbered</p> <p>10 number is under manufacturer?</p> <p>11 A. So this will be the number at Owens</p> <p>12 and Minor, the manufacturer number. Like you see</p> <p>13 how it ends in 9515, right here?</p> <p>14 Q. Yes.</p> <p>15 A. So then these first -- 7070, it's the</p> <p>16 vendor number that Owens and Minor gets the gown</p> <p>17 from so I know right off the bat, 7070, it's</p> <p>18 Cardinal, but I -- the end user wouldn't know that.</p> <p>19 They just know that they want that gown and that's</p> <p>20 it.</p> <p>21 Q. Okay. So could a user search by the</p> <p>22 name Cardinal and pull up --</p> <p>23 A. No.</p> <p>24 Q. -- an item?</p> <p>25 A. Only if we put the word Cardinal in</p>	<p>55</p> <p>1 Q. Okay. Could you try searching 7070.</p> <p>2 (Pause.)</p> <p>3 Q. Did I get that right? Was it 7070</p> <p>4 associated with Cardinal?</p> <p>5 A. 7070.</p> <p>6 (Pause.)</p> <p>7 A. There's no search.</p> <p>8 Q. Okay. All right. Could we try</p> <p>9 searching 9515?</p> <p>10 A. That's the gown we selected.</p> <p>11 Q. Okay. So the 9515 is the</p> <p>12 manufacturer number associated with that item?</p> <p>13 A. Correct.</p> <p>14 Q. I see.</p> <p>15 (Pause.)</p> <p>16 Q. Okay. Could you -- sorry. Could you</p> <p>17 just try again the 4352 and see what the result is.</p> <p>18 (Pause.)</p> <p>19 Q. Could you try searching 4352 with a</p> <p>20 comma in?</p> <p>21 (Pause.)</p> <p>22 Q. Okay. Could you try searching</p> <p>23 Abaline?</p> <p>24 Okay. Let's -- let's go back --</p> <p>25 let's do a search for -- for gown once again.</p>
<p>54</p> <p>1 the description or somewhere that the field's</p> <p>2 searching on.</p> <p>3 Q. Okay. Does the -- does the number</p> <p>4 4352 that's shown under Owed next to manufacturer,</p> <p>5 is that number tied to Cardinal?</p> <p>6 A. I'm not sure what 4352 is to be</p> <p>7 honest with you.</p> <p>8 Q. Okay. Do you know if that number</p> <p>9 would be searchable?</p> <p>10 A. 4352?</p> <p>11 Q. Yes.</p> <p>12 A. I don't think so but we could search</p> <p>13 it.</p> <p>14 Q. Okay. Yeah. If we could. Go back</p> <p>15 and --</p> <p>16 A. 4352. 4352. Please go back.</p> <p>17 Q. And search just for that number,</p> <p>18 4352.</p> <p>19 A. It brings you everything that has</p> <p>20 that number in it, 4352.</p> <p>21 Q. And do you see where that number</p> <p>22 appears by itself?</p> <p>23 A. Let's look in this column first.</p> <p>24 (Pause.)</p> <p>25 A. It's not there by itself.</p>	<p>56</p> <p>1 Okay. And can we scroll down to see what else is</p> <p>2 on the list.</p> <p>3 (Pause.)</p> <p>4 Q. Okay. That -- that's fine. You</p> <p>5 can -- could you scroll back up to the top and</p> <p>6 select the item number 10616 again.</p> <p>7 A. Mm'mm.</p> <p>8 Q. Okay. And could you just scroll down</p> <p>9 to the bottom to show the entirety of that detail.</p> <p>10 Okay. Now, could you add that item to shopping</p> <p>11 cart.</p> <p>12 A. Okay.</p> <p>13 Q. Okay. Now, could you go back to the</p> <p>14 list again. And could you select item number 10619</p> <p>15 and view the item detail for that item. Okay.</p> <p>16 And -- yeah. If you could scroll down and show</p> <p>17 what's there.</p> <p>18 Okay. And would you add that item to</p> <p>19 the shopping cart.</p> <p>20 Okay. And is it possible now to --</p> <p>21 to view the item associated with number 10616 from</p> <p>22 the shopping cart? Okay. And could you click on</p> <p>23 the Detail tab --</p> <p>24 A. Mm'mm.</p> <p>25 Q. -- up above and just kind of scroll</p>

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<p>57</p> <p>1 down through that one to show what's there.</p> <p>2 Okay. Now, could you remove that</p> <p>3 item from the cart.</p> <p>4 A. Okay.</p> <p>5 Q. Okay. Great. Now, could we go back</p> <p>6 to the -- to the search window again and we'll</p> <p>7 search for a different item.</p> <p>8 Could you try searching for</p> <p>9 batteries? I don't know whether it should be</p> <p>10 plural or singular.</p> <p>11 (Pause.)</p> <p>12 Q. All right. Is that all the items</p> <p>13 there or there's more?</p> <p>14 A. There's more.</p> <p>15 Q. Okay. Would you just look -- I'm</p> <p>16 trying to look myself but if you see any -- I saw</p> <p>17 there were several batteries available from</p> <p>18 Duracell it looked like and I was trying to see if</p> <p>19 maybe you also have some batteries available from</p> <p>20 Energizer.</p> <p>21 (Pause.)</p> <p>22 Q. Okay. Maybe if we go back to the --</p> <p>23 to the top of the first list and then we could</p> <p>24 narrow our search down by like a particular type of</p> <p>25 battery so we won't get all these very</p>	<p>59</p> <p>1 1.5. It just made a match on b-a-t-t.</p> <p>2 Q. Yeah. I see.</p> <p>3 Okay. Could you try doing the</p> <p>4 b-a-t-t and then adding, yeah, the 1.5 volt --</p> <p>5 actually, let's just -- instead of using the 1.5</p> <p>6 volt try AA again.</p> <p>7 (Pause.)</p> <p>8 Q. Aye yie yie.</p> <p>9 A. Yeah. This --</p> <p>10 Q. Okay.</p> <p>11 A. -- matches everything that you put in.</p> <p>12 Q. Yeah. It's not very good.</p> <p>13 Okay. Could you try typing in lotion</p> <p>14 and see what we get as a result there?</p> <p>15 (Pause.)</p> <p>16 A. That's it.</p> <p>17 Q. Okay. Would you click on the item</p> <p>18 61892.</p> <p>19 Would that 3459 would that be</p> <p>20 associated with any manufacturer?</p> <p>21 A. The manufacturer number would be</p> <p>22 35118.</p> <p>23 Q. Oh, I see. And do you know who that</p> <p>24 manufacturer is?</p> <p>25 A. Not off the top of my head. I don't</p>
<p>58</p> <p>1 specialized -- for instance, could you add AA with</p> <p>2 the battery up in the search field and see if we</p> <p>3 could limit our search to just AA batteries?</p> <p>4 Only one.</p> <p>5 Okay. Could you go back then. Just</p> <p>6 do a search for battery again. And, yeah. Just</p> <p>7 scroll down a little bit more. See what else is</p> <p>8 available there.</p> <p>9 How about -- could you try typing in</p> <p>10 1.5V? Just see --</p> <p>11 A. Right next to battery?</p> <p>12 Q. Yes.</p> <p>13 (Pause.)</p> <p>14 A. That's it.</p> <p>15 Q. Okay. What if you -- if -- if the</p> <p>16 item had been typed in as, say, an abbreviation of</p> <p>17 battery or if it was typed in as plural? Could you</p> <p>18 just type in, say, like b-a-t-t --</p> <p>19 A. Mm'mm.</p> <p>20 Q. -- to see if there's other items</p> <p>21 and -- and also could you put in the 1.5V --</p> <p>22 A. Okay.</p> <p>23 Q. -- so that maybe we could pick up any</p> <p>24 items that have been described differently.</p> <p>25 A. So this one didn't make a match under</p>	<p>60</p> <p>1 know who 3459 is.</p> <p>2 Q. Okay. Okay. So could we go back</p> <p>3 then to the results list and could you click on</p> <p>4 that first one, 10161.</p> <p>5 Okay. Could you go back to the</p> <p>6 search list again.</p> <p>7 A. I believe that's Johnson & Johnson.</p> <p>8 Q. Oh, that one's Johnson & Johnson?</p> <p>9 Okay.</p> <p>10 A. I think it's Johnson & Johnson.</p> <p>11 Q. Could you scroll down a little bit.</p> <p>12 All right. Let's try searching for a</p> <p>13 different item. Could we search for in the Search</p> <p>14 box SOL and space NACL -- sorry. NACL. Sodium</p> <p>15 chloride.</p> <p>16 A. Solution.</p> <p>17 Q. Okay. And can we kind of scroll down</p> <p>18 there and see what we have.</p> <p>19 (Pause.)</p> <p>20 Q. Okay. That's fine. You can go back</p> <p>21 to the previous list.</p> <p>22 A. Yeah. This is going to be pages and</p> <p>23 pages.</p> <p>24 Q. Okay. Let's narrow it down some</p> <p>25 then.</p>

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<p>61</p> <p>1 A. Okay.</p> <p>2 Q. Can we do 0.9 percent in addition to</p> <p>3 that, and let's also make it -- could you put a</p> <p>4 space and put INJ, all right, and can we search for</p> <p>5 that. Still getting a lot of items?</p> <p>6 A. No. Nine items.</p> <p>7 Q. Okay. That's pretty good then.</p> <p>8 All right. Hold on just a minute.</p> <p>9 Could you just hold it? Go back down again. Sorry.</p> <p>10 A. That's all right.</p> <p>11 Q. Okay. Could you click on item number</p> <p>12 10793. And you scroll down there. Okay. So we've</p> <p>13 got a manufacturer code 4125.</p> <p>14 And do you know which -- which</p> <p>15 manufacturer this would be associated with?</p> <p>16 A. What number is this?</p> <p>17 Okay. Medifil.</p> <p>18 Q. How can you tell that?</p> <p>19 A. I know that this is a -- just by the</p> <p>20 manufacturer number, MIS, gives it away and then I</p> <p>21 looked at the description. This is -- this is our</p> <p>22 three ml prefilled syringes and we only get two</p> <p>23 which is 3 ml, 10 ml from Medifil.</p> <p>24 Q. I see. Okay. So all of the 3 ml</p> <p>25 syringes come from Medifil?</p>	<p>63</p> <p>1 Q. All right. I think we need to take a</p> <p>2 break because we're out of tape.</p> <p>3 THE WITNESS: Okay.</p> <p>4 MR. CLEMENTS: So if we could go off</p> <p>5 the record.</p> <p>6 THE VIDEOGRAPHER: This concludes</p> <p>7 volume number one, tape number one in the</p> <p>8 deposition of Manuel Matias.</p> <p>9 Going off the record. The time is</p> <p>10 12:22.,</p> <p>11 (Recess taken at 12:22 p.m.)</p> <p>12 THE VIDEOGRAPHER: Back on the record.</p> <p>13 Here marks the beginning of volume</p> <p>14 one, tape number two in the deposition of Manuel</p> <p>15 Matias. The time is 12:30.,</p> <p>16 BY MR. CLEMENTS:</p> <p>17 Q. Okay. Mr. Matias, before the break</p> <p>18 we were just looking at two different solutions</p> <p>19 here.</p> <p>20 The first one we looked at had --</p> <p>21 associated with item number 10793 you said was</p> <p>22 associated with the manufacturer, Medifil, and you</p> <p>23 could tell that from the number and the</p> <p>24 manufacturer code associated with that was 4123.</p> <p>25 And then we looked at a second item,</p>
<p>62</p> <p>1 A. The prefilled ones. These are --</p> <p>2 Q. Prefilled.</p> <p>3 A. -- already filled with solution.</p> <p>4 Q. Okay. Could you go back to the</p> <p>5 search result list. This may have answered my next</p> <p>6 question but scroll down to the bottom again.</p> <p>7 Okay. And could you click on the</p> <p>8 item 20798. And could you scroll down?</p> <p>9 So could you tell who the</p> <p>10 manufacturer is for this one?</p> <p>11 A. Not for this one, no.</p> <p>12 Q. Would the manufacturer be different</p> <p>13 from Medifil?</p> <p>14 A. Yes.</p> <p>15 Q. And how do you tell that?</p> <p>16 A. The first four numbers here, 0723.</p> <p>17 Q. As compared to...</p> <p>18 A. The 42 --</p> <p>19 Q. 4123?</p> <p>20 A. Right.</p> <p>21 Q. Okay. So these are two different</p> <p>22 manufacturer codes that Owens and Minor uses --</p> <p>23 A. Right.</p> <p>24 Q. -- for these two manufacturers?</p> <p>25 A. Mm/hm. Correct.</p>	<p>64</p> <p>1 similar solution item that had the item number</p> <p>2 20798 and that was associated with a different</p> <p>3 manufacturer which had the code 0723 which was a</p> <p>4 different manufacturer from Medifil. Is that</p> <p>5 correct?</p> <p>6 A. Correct.</p> <p>7 MR. GRAHAM: Objection to the extent</p> <p>8 that you're characterizing them to the solutions as</p> <p>9 similar.</p> <p>10 Q. Okay. If we could go back to the</p> <p>11 search results list, please. And if we could -- if</p> <p>12 we could scroll down again and -- and I'd like to</p> <p>13 take another look at item number 10793. Okay. And</p> <p>14 if we could just scroll down and -- and look at the</p> <p>15 detail there on the item.</p> <p>16 Okay. And now could we add that item</p> <p>17 to the shopping cart, please. Okay. And now could</p> <p>18 you go back to the search result list, please.</p> <p>19 Now, could we scroll down again and</p> <p>20 could you select the item number 20798 and could we</p> <p>21 also look at that item description? Okay. And now</p> <p>22 would you add that item to the cart, please.</p> <p>23 Okay. And now could you pull up the</p> <p>24 item detail from the cart for item number 10793.</p> <p>25 Okay. And could you also -- yeah. Flip over to</p>

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<p>65</p> <p>1 the Detail tab and -- and review that.</p> <p>2 (Pause.)</p> <p>3 Q. Okay. Now, could you add that item</p> <p>4 to the cart, please.</p> <p>5 A. It's there already.</p> <p>6 MR. SHRAGER: It's already there.</p> <p>7 Q. Oh, I'm sorry. Could you delete that</p> <p>8 item from the cart, please.</p> <p>9 A. Deleted.</p> <p>10 Q. Okay. I -- I apologize. We're going</p> <p>11 to have to repeat another step here because I</p> <p>12 realized that we have the same vendor for both the</p> <p>13 items in our -- in our cart now.</p> <p>14 So could we go back to the Search tab</p> <p>15 again and could we do a search for battery?</p> <p>16 A. Just so that you know that you might</p> <p>17 have the same vendor for a lot of the items because</p> <p>18 we get everything from Owens and Minor.</p> <p>19 Q. Would that be true for the batteries</p> <p>20 as well?</p> <p>21 A. Yes.</p> <p>22 Q. Oh, I see. Okay.</p> <p>23 Okay. Let's do a search for gown</p> <p>24 again because we had a different vendor for one of</p> <p>25 these gowns.</p>	<p>67</p> <p>1 means.</p> <p>2 Q. Okay. So normally you would expect</p> <p>3 this requisition to go through --</p> <p>4 A. To go through.</p> <p>5 Q. -- smoothly?</p> <p>6 A. Correct.</p> <p>7 THE WITNESS: PO number...</p> <p>8 (Pause.)</p> <p>9 A. Can I navigate through the screen to</p> <p>10 look at something else?</p> <p>11 MR. IRWIN: Manny, this is RSS. This</p> <p>12 is what the end user could do. What would they do?</p> <p>13 THE WITNESS: They will call us now</p> <p>14 because they can't complete the requisition.</p> <p>15 Q. Okay. Could we go back to the -- to</p> <p>16 the search module again then?</p> <p>17 A. Mm'mm.</p> <p>18 Q. And see what else we could search for</p> <p>19 here.</p> <p>20 Could you try searching for diaper?</p> <p>21 (Pause.)</p> <p>22 Q. Okay. I guess go back to the top</p> <p>23 and -- let's see.</p> <p>24 Could you click on item 10119.</p> <p>25 Yeah. Okay. Could we go back then?</p>
<p>66</p> <p>1 MR. SHRAGER: Abaline?</p> <p>2 MR. CLEMENTS: Yeah.</p> <p>3 A. Mm'mm.</p> <p>4 Q. Okay. And could you look at item</p> <p>5 10616. Okay. And would you add that item to the</p> <p>6 cart again, please.</p> <p>7 Okay. And now would you -- from the</p> <p>8 cart would you look at item 10619. Okay. And</p> <p>9 could we look at the Detail tab as well.</p> <p>10 (Pause.)</p> <p>11 Q. Okay. And would you delete item</p> <p>12 10619 from the cart.</p> <p>13 Okay. And now would you walk through</p> <p>14 building the requisition and submitting the</p> <p>15 purchase order for these items.</p> <p>16 A. Okay. Once the end user's done, this</p> <p>17 is all that she needs to order -- or he. All they</p> <p>18 have to do is click check-out.</p> <p>19 Q. Okay.</p> <p>20 A. Okay. So...</p> <p>21 (Pause.)</p> <p>22 THE WITNESS: I have an error now.</p> <p>23 Great. "PO vendor item not found."</p> <p>24 (Pause.)</p> <p>25 A. I really do not know what this error</p>	<p>68</p> <p>1 I'd like to try to find one that's from a different</p> <p>2 vendor than Owens and Minor.</p> <p>3 (Pause.)</p> <p>4 Q. Okay. So we got one here from</p> <p>5 Cardinal Health. And does this one have a price</p> <p>6 associated with it?</p> <p>7 A. No, no price.</p> <p>8 Q. Does that mean it's -- would you</p> <p>9 still be able to go through and create a purchase</p> <p>10 order?</p> <p>11 A. Yes. We'll just have to put like a</p> <p>12 penny price in there.</p> <p>13 Q. I see. Okay.</p> <p>14 MR. CLEMENTS: Hold on just a moment.</p> <p>15 (Pause.)</p> <p>16 Q. Okay. Could you go back to the</p> <p>17 search again and could we narrow the search for the</p> <p>18 diaper. Let's try after the diaper putting a space</p> <p>19 PRMTR.</p> <p>20 A. P-r-m?</p> <p>21 Q. T-r. And could you search that.</p> <p>22 Okay. And could you click on the</p> <p>23 10583.</p> <p>24 A. It's going to be Owens and Minor.</p> <p>25 Q. Okay. Could you scroll up again?</p>

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<p>69</p> <p>1 I'm sorry.</p> <p>2 (Pause.)</p> <p>3 Q. Okay. Could we go back to the search</p> <p>4 again and could you erase the search bar and let's</p> <p>5 just try -- type HGGS and could we scroll down</p> <p>6 there to see what else is available.</p> <p>7 Do you remember what the item number</p> <p>8 was for the first diapers we had from Cardinal</p> <p>9 Health? I have it written down as 10736 but I'm</p> <p>10 not seeing them now.</p> <p>11 A. I do not remember.</p> <p>12 Q. Okay. Could you click on item 48381,</p> <p>13 please. Oh, that's it. I wrote down the wrong</p> <p>14 number.</p> <p>15 4831...</p> <p>16 Okay. And as a test could we try</p> <p>17 without actually -- I don't want to submit the</p> <p>18 purchase order yet. I just want to see if we're</p> <p>19 going to have the same problem that we had with the</p> <p>20 gown that wouldn't go through, the requisition</p> <p>21 deal.</p> <p>22 A. Okay.</p> <p>23 Q. Could you add this one to the cart</p> <p>24 and delete the gown off there and just see if it</p> <p>25 will be able to requisition?</p>	<p>71</p> <p>1 Q. Okay. And if you could scroll down</p> <p>2 to -- to view all the items on the list.</p> <p>3 Okay. Now, could we go back up to</p> <p>4 the -- to the search -- yeah -- in addition to</p> <p>5 Huggies -- leave that there -- excuse me. In</p> <p>6 addition to the HGGS put a space and could you type</p> <p>7 in diaper and put a space and type in PRMTR and</p> <p>8 search. Okay.</p> <p>9 Now, would you select the item detail</p> <p>10 for item number 10583. Could you scroll down</p> <p>11 there. Okay. And now would you add that item to</p> <p>12 the cart, please.</p> <p>13 Okay. Now, could we go back to the</p> <p>14 search results list.</p> <p>15 And now would you remove the HGGS and</p> <p>16 just search for diaper space PRMTR.</p> <p>17 Okay. And now would you select item</p> <p>18 number 48381, please. And could you scroll down to</p> <p>19 show the information on that item.</p> <p>20 Okay. And now could we add that item</p> <p>21 to the cart, please.</p> <p>22 Okay. Now, would you go to your --</p> <p>23 your shopping cart and open up the description for</p> <p>24 item number 10583.</p> <p>25 Okay. And would you also look under</p>
<p>70</p> <p>1 A. Sure.</p> <p>2 Q. Just as a test.</p> <p>3 A. I'm going to delete this one first.</p> <p>4 Q. Yes.</p> <p>5 A. I have to put a price or else it's</p> <p>6 not going to add it --</p> <p>7 Q. Okay.</p> <p>8 A. -- so I'm going to put a penny and</p> <p>9 I'm going to check out.</p> <p>10 Q. Okay. Okay. So it looks like that</p> <p>11 one's working.</p> <p>12 A. Mm'mm.</p> <p>13 Q. Okay. Great. So now -- now what I'd</p> <p>14 like to do is I'd like to empty out the cart.</p> <p>15 Okay. It's already empty, right, because we</p> <p>16 already built the requisition. Okay. Great.</p> <p>17 All right. So let's -- let's start</p> <p>18 over then and could we go back to our search field?</p> <p>19 A. We're still ordering nonstock?</p> <p>20 Q. Yes. Okay. And could you first do a</p> <p>21 search for HGGS and could you tell me, do you have</p> <p>22 an idea of what HGGS stands for?</p> <p>23 A. Huggies.</p> <p>24 Q. Okay.</p> <p>25 A. Huggies.</p>	<p>72</p> <p>1 the Detail tab and scroll down to see that</p> <p>2 information.</p> <p>3 (Pause.)</p> <p>4 Q. Okay. And now could we remove that</p> <p>5 item from the cart.</p> <p>6 Okay. Now, could we do a search --</p> <p>7 another search for gown and could you select item</p> <p>8 number 10619. Wait. Go ahead and, yeah, view the</p> <p>9 detail for it first.</p> <p>10 Okay. Now, could we add that item to</p> <p>11 the shopping cart.</p> <p>12 Okay. And now could we go ahead and</p> <p>13 check out and submit a purchase order for these --</p> <p>14 A. Mm'mm.</p> <p>15 Q. -- items that we have in our shopping</p> <p>16 cart.</p> <p>17 And could you explain sort of the</p> <p>18 steps as you go through.</p> <p>19 A. Building a PO?</p> <p>20 Q. Yeah. Building a purchase order.</p> <p>21 A. I'm going to close the screen out</p> <p>22 because I don't need to -- to be in RSS any more.</p> <p>23 I'm just going to go to RQ 10 to make sure that the</p> <p>24 requisitions that we just created got there okay.</p> <p>25 Q. Okay.</p>

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<p>73</p> <p>1 A. And I'm a little rusty creating POs</p> <p>2 because I don't do it every day.</p> <p>3 Q. Okay. Now, the only one I want to</p> <p>4 create a purchase order from is the second one --</p> <p>5 A. The last one?</p> <p>6 Q. Yes.</p> <p>7 A. Okay. Okay. So process here means</p> <p>8 that it -- it processed. It's waiting to get on a</p> <p>9 PO. Those are the item numbers, you know, that we</p> <p>10 selected. You can tell the price here.</p> <p>11 I'm going to go into PO 100 to build</p> <p>12 a PO out of the requisition that --</p> <p>13 Q. Okay. Could you just briefly explain</p> <p>14 what PO 100 is?</p> <p>15 A. PO 100 puts all the requisitions that</p> <p>16 were already processed or approved from RSS into a</p> <p>17 PO.</p> <p>18 Q. Okay.</p> <p>19 A. Without us having to manually key</p> <p>20 every single line into the PO.</p> <p>21 Q. Okay.</p> <p>22 A. I just changed the default buyer</p> <p>23 because I knew -- I picked the OR and Katie</p> <p>24 Willmore is the buyer for that department so I have</p> <p>25 to make sure that I select the right initials in</p>	<p>75</p> <p>1 Q. Okay.</p> <p>2 A. But I'm going to go to PO 20 now and</p> <p>3 see if we can pull up those two POs that I created.</p> <p>4 Q. Okay. So you know you got the two</p> <p>5 purchase orders created for the items that we had</p> <p>6 in that requisition?</p> <p>7 A. Correct.</p> <p>8 Q. Okay.</p> <p>9 A. And here's the PO.</p> <p>10 So the PO number is -- for the</p> <p>11 Cardinal item is 1026370.</p> <p>12 Q. Okay.</p> <p>13 A. And if we do previous should bring me</p> <p>14 the Owens and Minor one. 1026369.</p> <p>15 Q. Okay. Could we go back to PO 100 for</p> <p>16 a moment.</p> <p>17 A. Sure.</p> <p>18 Q. Okay. And if you scroll over to the</p> <p>19 right of the screen, see where it says Print</p> <p>20 Manager? Could you select that?</p> <p>21 A. Mm'mm.</p> <p>22 Q. And would we be able to see the</p> <p>23 purchase orders associated with that requisition</p> <p>24 that we built in here in this list?</p> <p>25 A. We're not going to be able to see it</p>
<p>74</p> <p>1 order for the req to come down.</p> <p>2 Q. Okay.</p> <p>3 A. And I'm just going to create a PO</p> <p>4 just on that requisition number alone. I don't</p> <p>5 want to bring everything from the OR into a PO.</p> <p>6 Q. Okay.</p> <p>7 (Pause.)</p> <p>8 A. I'm sorry. I don't know why this</p> <p>9 error is coming up now.</p> <p>10 (Pause.)</p> <p>11 Q. I think you still had -- under the</p> <p>12 Filters tab you had the buyer in there. You might</p> <p>13 need to clear that out.</p> <p>14 A. The N defaults there automatically;</p> <p>15 the letter N.</p> <p>16 (Pause.)</p> <p>17 A. I'm going to go to PO 23. Maybe I</p> <p>18 can clear it out from here.</p> <p>19 Q. Okay.</p> <p>20 A. Give me one second.</p> <p>21 (Pause.)</p> <p>22 A. Okay. So I think when I pulled it</p> <p>23 out of here it put it into a PO. I'm not familiar</p> <p>24 with the PO 100s. Like I told you I don't run it</p> <p>25 every day. The buyers do.</p>	<p>76</p> <p>1 in here because the job doesn't run.</p> <p>2 Q. Oh, I see.</p> <p>3 A. The PO 100.</p> <p>4 Q. It didn't run through PO 100?</p> <p>5 A. Correct.</p> <p>6 Q. Is there a way to see a printout like</p> <p>7 that for that particular requisition to show that</p> <p>8 the two purchase orders, the same document</p> <p>9 associated with one requisition? Do you understand</p> <p>10 what I'm asking?</p> <p>11 A. I understand what you're asking but</p> <p>12 it will come up in PO 100 but for some reason I</p> <p>13 didn't know how to work it so they don't run so</p> <p>14 we're not going to be able to see it.</p> <p>15 I could pull up a PO 100 from today</p> <p>16 that somebody else might have created and show you</p> <p>17 that.</p> <p>18 Q. Okay. And would it show the multiple</p> <p>19 purchase orders --</p> <p>20 A. It will show requisitions and</p> <p>21 multiple purchase orders.</p> <p>22 Q. Okay. Yeah. If we could see</p> <p>23 something like that.</p> <p>24 (Pause.)</p> <p>25 A. So this was Dennis Devine. He's one</p>

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<p>77</p> <p>1 of our buyers. And that's the first page. So you</p> <p>2 could see the vendor number. The purchase order</p> <p>3 got created. This should tell you the requis --</p> <p>4 the requisition number right here, the 25923. You</p> <p>5 see it right here?</p> <p>6 Q. Okay. So everything shown on this</p> <p>7 document is associated with that same requisition?</p> <p>8 A. Not necessarily.</p> <p>9 Q. Not necessarily.</p> <p>10 A. No. There could be others. You see</p> <p>11 that one here?</p> <p>12 Q. Oh, it's different?</p> <p>13 A. A different PO number.</p> <p>14 Q. And it's a different requisition --</p> <p>15 A. A different requisition number.</p> <p>16 Q. Okay. Well, that -- that's fine.</p> <p>17 But if we had submitted that</p> <p>18 requisition that we built through PO 100 we would</p> <p>19 have been able to see one document that showed the</p> <p>20 two purchase orders created from that single</p> <p>21 requisition?</p> <p>22 A. Correct.</p> <p>23 Q. Okay.</p> <p>24 A. Something similar like this. It will</p> <p>25 just have two PO numbers with the same requisition</p>	<p>79</p> <p>1 Q. -- from RQ 10?</p> <p>2 A. Okay. So I will have to put a</p> <p>3 department again.</p> <p>4 Q. Okay.</p> <p>5 A. Company 1000 stays the same because</p> <p>6 that's us. The department defaulted from what I</p> <p>7 put up here. If I have any Deliver To information.</p> <p>8 I have to select purch because we're going to do a</p> <p>9 nonstock requisition.</p> <p>10 Everything else is blank.</p> <p>11 Q. Now, if we want to add items --</p> <p>12 A. Okay.</p> <p>13 Q. -- to this requisition, show us how</p> <p>14 you do that.</p> <p>15 A. And I would need to know the item</p> <p>16 number and...</p> <p>17 Q. Okay. But instead of using the item</p> <p>18 number can you click on the -- the little double</p> <p>19 arrow icon there?</p> <p>20 A. Sure.</p> <p>21 Q. And from this list can you -- can you</p> <p>22 explain, first of all, what this list is showing?</p> <p>23 A. This will give you all the active</p> <p>24 items at that requisition location so anything</p> <p>25 that's active in the Item Master should come up.</p>
<p>78</p> <p>1 number.</p> <p>2 Q. Right. Okay. So PO 100 can generate</p> <p>3 multiple purchase orders from a single requisition?</p> <p>4 A. Correct.</p> <p>5 Q. Okay.</p> <p>6 A. If there's multiple vendors in there,</p> <p>7 yes.</p> <p>8 Q. Right.</p> <p>9 A. Mm'mm.</p> <p>10 Q. All right. We're done with that for</p> <p>11 now.</p> <p>12 I did want to look at one other thing</p> <p>13 before I'm finished with the demonstration, and I</p> <p>14 know that Mr. Graham here has just a few questions</p> <p>15 for you, too.</p> <p>16 Could we go to RQ 10 again --</p> <p>17 A. Mm'mm.</p> <p>18 Q. -- to look at that.</p> <p>19 No. I don't want to look at our old</p> <p>20 requisition. Go ahead and clear that out but could</p> <p>21 you go ahead and put in this first page the</p> <p>22 information that you would need to put on from</p> <p>23 location and so forth in order to build a</p> <p>24 requisition --</p> <p>25 A. Okay.</p>	<p>80</p> <p>1 Q. Okay. And -- and then the choices</p> <p>2 you have here in your menu show you the different</p> <p>3 ways --</p> <p>4 A. Different ways.</p> <p>5 Q. -- to arrange those items?</p> <p>6 A. Different ways you can bring up that</p> <p>7 list.</p> <p>8 Q. Okay. And could you scroll down on</p> <p>9 the list and just keep scrolling down.</p> <p>10 Okay. Could we -- could you select</p> <p>11 the manufacturer code search.</p> <p>12 Okay. And could you explain what</p> <p>13 we're seeing over in the first column as Code at</p> <p>14 the top?</p> <p>15 A. Okay. This column that says Code</p> <p>16 comes from IC 11. If -- when we enter an item we</p> <p>17 populate that field and basically this is all the</p> <p>18 item -- vendor numbers that Owens and Minor has</p> <p>19 provided to us that they use in their system.</p> <p>20 So like 0011 might mean a different</p> <p>21 company name, you know, for Owens and Minor.</p> <p>22 Q. Okay. So these are only codes that</p> <p>23 are associated with items that are available from</p> <p>24 Owens and Minor?</p> <p>25 A. Correct. We only -- we only put the</p>

<p>81</p> <p>1 codes for Owens and Minor items since 99 percent of</p> <p>2 all our stuff comes through them.</p> <p>3 Q. I see. Okay. Could we go then and</p> <p>4 select -- could you go up and click on the Search</p> <p>5 box up at the top.</p> <p>6 A. Mm'mm.</p> <p>7 Q. Could you explain what this box does?</p> <p>8 A. Sure. Instead of you scrolling, you</p> <p>9 know, through the various pages you could select</p> <p>10 code if you know the code number. You could put it</p> <p>11 in here, in this little field. You could do --</p> <p>12 mostly the ones we use is like so it could bring up</p> <p>13 more choices for us and then we're the ones that</p> <p>14 narrow it down.</p> <p>15 If you want a similar search by the</p> <p>16 number field you have to, you know, pick number</p> <p>17 and, again, we use like to give us more choices.</p> <p>18 If you want to search by the Lawson</p> <p>19 item you have to pick the item field here and again</p> <p>20 we use the word like to bring us more choices and</p> <p>21 if you want to search by the item description,</p> <p>22 again, we could put like to give us more choices.</p> <p>23 Instead of the user having to go --</p> <p>24 well, instead of us having to go, you know, next</p> <p>25 25, next 25, next 25 for us to find the item number</p>	<p>83</p> <p>1 A. That's the vendor -- yes -- no. The</p> <p>2 manufacturer code is this field here that says</p> <p>3 number.</p> <p>4 Q. Okay.</p> <p>5 A. The code is the vendor number that</p> <p>6 Owens and Minor has for that item.</p> <p>7 Q. I see. Okay. And so for this code</p> <p>8 could you -- could you type in 0723.</p> <p>9 Okay. I thought 0723 was associated</p> <p>10 with the manufacturer we had before for the other</p> <p>11 solution but it's not coming up here. That's okay.</p> <p>12 MR. CLEMENTS: Give me just a moment.</p> <p>13 THE WITNESS: Mm'mm. Mm'mm.</p> <p>14 (Pause.)</p> <p>15 MR. CLEMENTS: Okay. Mr. Matias,</p> <p>16 thanks for your time.</p> <p>17 THE WITNESS: Okay.</p> <p>18 MR. CLEMENTS: That's all the</p> <p>19 questions I have. I think Mr. Graham has --</p> <p>20 MR. SHRAGER: Mr. Graham has a</p> <p>21 couple.</p> <p>22 MR. CLEMENTS: -- questions.</p> <p>23 MR. GRAHAM: I'll try to be brief.</p> <p>24 CROSS-EXAMINATION BY MR. GRAHAM:</p> <p>25 Q. When you're entering an item inside</p>
<p>82</p> <p>1 we're looking for.</p> <p>2 Q. Right. Okay. All right. And so</p> <p>3 could you choose the Filter button up above.</p> <p>4 Switch it over from Find to Filter.</p> <p>5 A. Mm'mm.</p> <p>6 Q. And underneath the search here could</p> <p>7 you type in item description -- and you have it as</p> <p>8 like -- and could we type in SOL space INJ.</p> <p>9 Okay. And is there a way to view a</p> <p>10 more detailed --</p> <p>11 A. More detailed than this?</p> <p>12 Q. -- description?</p> <p>13 A. No.</p> <p>14 Q. Okay.</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Okay. And could you pull the</p> <p>17 search -- sorry. Go back to the Search feature</p> <p>18 again.</p> <p>19 A. Mm'mm.</p> <p>20 Q. And instead of choosing item</p> <p>21 description for the field could we choose the</p> <p>22 asterisk code.</p> <p>23 A. Okay.</p> <p>24 Q. And is the asterisk code, is that the</p> <p>25 manufacturer code number?</p>	<p>84</p> <p>1 Item Master you're talking about how you're limited</p> <p>2 to 30 characters for the description?</p> <p>3 A. Correct.</p> <p>4 Q. Who -- who is -- who names or who</p> <p>5 adds the description field to the Item Master?</p> <p>6 A. Right now it's usually myself or the</p> <p>7 four buyers that I have working for me.</p> <p>8 Q. So there's five people that could --</p> <p>9 A. Correct.</p> <p>10 Q. -- enter it?</p> <p>11 Is there a standard naming convention</p> <p>12 that you use?</p> <p>13 A. We try to use the noun first so if</p> <p>14 it's a bandaid depending on how long bandaid is we</p> <p>15 try to limit to five characters. So like, for</p> <p>16 example, suture, instead of putting in the entire</p> <p>17 word suture, we put it in as s-u-t for like sut so</p> <p>18 everybody knows anything that started with s-u-t</p> <p>19 it's a suture. Solution, s-o-l.</p> <p>20 Q. Is that a naming convention that</p> <p>21 you -- that you designed here at Robert Wood</p> <p>22 Johnson or was that something that Lawson taught</p> <p>23 you how to do?</p> <p>24 A. No. That's an industry standard.</p> <p>25 Most of the hospitals use, you know, the noun and</p>

<p>85</p> <p>1 they abbreviate it because of space constraints in</p> <p>2 the Item Master fields.</p> <p>3 Q. Thank you. Can we go to the</p> <p>4 Requisition Self-Service field.</p> <p>5 A. Okay.</p> <p>6 Q. And could we go to the search. And</p> <p>7 could we do a search for SOL space NACL space 0.9</p> <p>8 percent INJ or space INJ.</p> <p>9 Could you scroll down to find item</p> <p>10 10793. These are the same items you were looking</p> <p>11 at before.</p> <p>12 A. Mm'mm.</p> <p>13 Q. Could you add that to the shopping</p> <p>14 cart for me.</p> <p>15 A. Okay.</p> <p>16 (Pause.)</p> <p>17 A. Okay.</p> <p>18 Q. Could you also add the next one,</p> <p>19 20798.</p> <p>20 A. Okay.</p> <p>21 Q. So these two items appear to have the</p> <p>22 same description.</p> <p>23 A. Correct.</p> <p>24 Q. But the price for item 20798 is</p> <p>25 \$60.54. Am I reading that right?</p>	<p>87</p> <p>1 A. Correct.</p> <p>2 Q. And that's despite the fact that</p> <p>3 their descriptions are the same?</p> <p>4 A. Right. You know, just like he said</p> <p>5 about the battery, you know, we don't have the</p> <p>6 greatest and latest data king (phonetic) on but all</p> <p>7 of our batteries are not from Duracell. They are</p> <p>8 from Energizer. We just didn't change the</p> <p>9 description but as long as we change the item</p> <p>10 number and we know that it -- it's going out with</p> <p>11 the right item number, we're getting the right</p> <p>12 product in.</p> <p>13 Q. Thanks.</p> <p>14 Can you delete those two items?</p> <p>15 Can you do a search for HGGS space</p> <p>16 diaper space PRMTR.</p> <p>17 So I'm looking at item number 48381?</p> <p>18 A. Yup. 48381.</p> <p>19 Q. The cost now shows 1 cent.</p> <p>20 A. Mm'mm.</p> <p>21 Q. And was that because you had changed</p> <p>22 it earlier in the demonstration?</p> <p>23 A. Correct. Because I changed it -- we</p> <p>24 have it set up for Lawson to calculate the last PO</p> <p>25 price when there's no price set up so whenever we</p>
<p>86</p> <p>1 A. Yes.</p> <p>2 Q. And the price for item 10793 is 31</p> <p>3 cents.</p> <p>4 A. Correct.</p> <p>5 Q. Are these the same item or would the</p> <p>6 price suggested these are different items?</p> <p>7 A. Not just the price will suggest</p> <p>8 they're a different item. I will have to go and do</p> <p>9 more research. Maybe the one on the top was a sub</p> <p>10 for the one on the bottom -- maybe the 20798 was a</p> <p>11 sub for 10793 and then we never used it and we --</p> <p>12 you know, we forgot to inactivate it or delete it,</p> <p>13 but the one on the bottom, the 10793, the price of</p> <p>14 an each -- the price is 31 cents each because</p> <p>15 that's an inventory number. That's issued out of</p> <p>16 the storeroom by an each.</p> <p>17 Q. So that the quantity lets you know</p> <p>18 that the top one, CS, is --</p> <p>19 A. Might be a nonstock item.</p> <p>20 Q. Might be a nonstock item. The bottom</p> <p>21 one is each?</p> <p>22 A. Mm'mm.</p> <p>23 Q. So if you were to order one -- if you</p> <p>24 were to order 20798 instead of 10793 you wouldn't</p> <p>25 receive the same thing?</p>	<p>88</p> <p>1 create a PO the system automatically puts the last</p> <p>2 PO price in it.</p> <p>3 Q. And generally when as it was before</p> <p>4 it's zero dollars, that's an item you have in</p> <p>5 stock. Is that correct?</p> <p>6 A. If it's zero dollar that means that</p> <p>7 we don't have a contract in place in PO 25.</p> <p>8 Q. So there's no way from this screen to</p> <p>9 tell what the price is?</p> <p>10 A. Correct. No.</p> <p>11 Q. And how would you eventually tell</p> <p>12 what the price was if you wanted to buy item number</p> <p>13 48381?</p> <p>14 A. If -- if the end user selects that</p> <p>15 item -- and I think that's why we couldn't pull PO</p> <p>16 100 -- it goes to PO 23 because it essentially is</p> <p>17 an error and they have to research the price and</p> <p>18 enter the right price in the PO before it goes out.</p> <p>19 Q. Who's they?</p> <p>20 A. The buyers.</p> <p>21 Q. Thank you.</p> <p>22 I'm just going to ask you a couple</p> <p>23 questions about GHX.</p> <p>24 A. Okay.</p> <p>25 Q. How long has Robert Wood Johnson been</p>

<p>89</p> <p>1 using GHX?</p> <p>2 A. I'm going to say 2 -- 1998. I'm</p> <p>3 going to say 2000, the year 2000.</p> <p>4 Q. So Robert Wood Johnson was using GHX</p> <p>5 prior to licensing Lawson Software?</p> <p>6 A. Prior to Lawson, yes.</p> <p>7 Q. And I believe you testified that all</p> <p>8 of the EDI transactions that go out from Lawson now</p> <p>9 go through GHX?</p> <p>10 A. Correct.</p> <p>11 Q. And then you can go to a Web site</p> <p>12 posted by GHX to determine whether or not a</p> <p>13 particular purchase order had been -- had gone</p> <p>14 through?</p> <p>15 A. Correct.</p> <p>16 Q. To the vendor. And that's how you</p> <p>17 can tell if an item's on back order or not?</p> <p>18 A. Correct.</p> <p>19 Q. So if using just the Lawson system</p> <p>20 and not GHX is there any way to tell if a</p> <p>21 particular item is in a vendor's inventory?</p> <p>22 A. We would have to then bring 832 --</p> <p>23 another transaction for 832 which is another</p> <p>24 transaction into Lawson in order to find out if</p> <p>25 that item is on that vendor's catalog.</p>	<p>91</p> <p>1 licensing Procurement Punch-Out?</p> <p>2 A. I don't think we ever considered</p> <p>3 that, no.</p> <p>4 MR. GRAHAM: That's all the questions</p> <p>5 I have.</p> <p>6 THE WITNESS: Okay.</p> <p>7 MR. SHRAGER: Thank you.</p> <p>8 MR. CLEMENTS: I've got just a couple</p> <p>9 of follow-up on his questions and then he'll have a</p> <p>10 couple to mine.</p> <p>11 REDIRECT EXAMINATION BY MR. CLEMENTS:</p> <p>12 Q. Okay. Could you go back to the -- to</p> <p>13 the Search tab again and could we do another search</p> <p>14 for the SOL space NACL space 0.9 per space INJ.</p> <p>15 Okay. And could you scroll down to</p> <p>16 the bottom.</p> <p>17 Okay. And the last two items on that</p> <p>18 list --</p> <p>19 A. Mm'mm.</p> <p>20 Q. -- item numbers 10793 and 20798,</p> <p>21 these were the ones we were discussing before?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And -- and in the next to last</p> <p>24 column next to item number 10793 there's the letters</p> <p>25 EA.</p>
<p>90</p> <p>1 Q. Is that something that you do?</p> <p>2 A. We don't do that.</p> <p>3 Q. Talk a little bit about PO 13.3.</p> <p>4 A. Mm'mm.</p> <p>5 Q. I believe that's the module that you</p> <p>6 can associate one Lawson item to more than one</p> <p>7 vendor item --</p> <p>8 A. Correct.</p> <p>9 Q. -- is that correct?</p> <p>10 A. Mm'mm.</p> <p>11 Q. And you stated earlier that you</p> <p>12 rarely use that?</p> <p>13 A. Correct.</p> <p>14 Q. Why is it only rarely used?</p> <p>15 A. That's only rarely used only for like</p> <p>16 inventory items. If there's a sub. So like if</p> <p>17 we're buying a bandaids from Johnson & Johnson but</p> <p>18 we can't get it from Johnson and Johnson but</p> <p>19 Hospira sells the bandaids so then we go in there</p> <p>20 and add the Hospira number and fix the PO so when</p> <p>21 it's received we're receiving the right product.</p> <p>22 Q. So it's used for inventory number --</p> <p>23 inventory items, not nonstock items?</p> <p>24 A. Correct.</p> <p>25 Q. Did Robert Wood Johnson ever consider</p>	<p>92</p> <p>1 A. Correct.</p> <p>2 Q. And what does EA mean?</p> <p>3 A. Each.</p> <p>4 Q. Okay. And then in that same column</p> <p>5 next to item number 20798 there's a CS?</p> <p>6 A. Case.</p> <p>7 Q. Case.</p> <p>8 A. Case.</p> <p>9 Q. Okay. And what's the difference</p> <p>10 between case and each?</p> <p>11 A. The difference is I know from looking</p> <p>12 at this item that 10793 is in the storeroom. When</p> <p>13 a department comes down or they request this item</p> <p>14 they usually don't want a case because a case has</p> <p>15 960 prefilled syringes.</p> <p>16 Q. Okay. So a case has 960 of whatever</p> <p>17 that particular item is?</p> <p>18 A. That amount may vary depending on the</p> <p>19 item but I know for this item I know it has 960.</p> <p>20 Q. Okay. So if you purchase 960 of the</p> <p>21 31 cent items there under item number 10793 it</p> <p>22 might come out to about the same price as what it</p> <p>23 would cost you for an entire case?</p> <p>24 A. Correct.</p> <p>25 Q. So -- then it could be the same item.</p>

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<p>93</p> <p>1 It's just a difference in quantity that you're</p> <p>2 purchasing. Is that correct?</p> <p>3 A. Correct. It could be the same item</p> <p>4 but I will have to do more research on 2798 to see</p> <p>5 if it's actually the same item or not.</p> <p>6 Q. Right. But the difference in price</p> <p>7 itself is not indicative that it's actually a</p> <p>8 different product?</p> <p>9 A. Correct. It's not -- correct.</p> <p>10 Q. Okay.</p> <p>11 MR. CLEMENTS: Okay. I think that's</p> <p>12 all the questions I have.</p> <p>13 MR. GRAHAM: Just -- sorry. One more</p> <p>14 question.</p> <p>15 RECROSS-EXAMINATION BY MR. GRAHAM:</p> <p>16 Q. Could you click on 20798 so I can see</p> <p>17 the details of that? And scroll to the bottom.</p> <p>18 We discussed today a little bit about</p> <p>19 that vendor item number that -- that long number</p> <p>20 that begins with 0 --</p> <p>21 A. Mm'mm.</p> <p>22 Q. -- 723.</p> <p>23 A. Right.</p> <p>24 Q. And I believe you stated that that</p> <p>25 0723 indicates the manufacturer.</p>	<p>95</p> <p>1 CERTIFICATE OF OFFICER</p> <p>2</p> <p>3</p> <p>4 I, PATRICIA J. RUSSONIELLO, a</p> <p>5 Certified Court Reporter and a Notary Public of the</p> <p>6 State of New Jersey, do hereby certify that prior</p> <p>7 to the commencement of the examination the witness</p> <p>8 was duly sworn by me.</p> <p>9 I DO FURTHER CERTIFY that the</p> <p>10 following is a true and accurate transcript of the</p> <p>11 testimony as taken stenographically by and before</p> <p>12 me at the date, time and place aforementioned and</p> <p>13 that reading and signing of the deposition has been</p> <p>14 requested.</p> <p>15 I DO FURTHER CERTIFY that I am</p> <p>16 neither a relative nor employee, nor attorney or</p> <p>17 counsel to any parties involved; that I am neither</p> <p>18 related to nor employed by any such attorney or</p> <p>19 counsel, and that I am not financially interested</p> <p>20 in the action.</p> <p>21</p> <p>22</p> <p>23</p> <p>24 A NOTARY PUBLIC OF THE STATE OF NEW JERSEY</p> <p>My Commission Expires: 4/20/2010</p> <p>25 C.C.R. License No. XI00517</p>
<p>94</p> <p>1 A. Correct.</p> <p>2 Q. Who generates those full numbering?</p> <p>3 A. This is given to us by our</p> <p>4 distributor, Owens and Minor. Other numbers are</p> <p>5 ten digits long and the first four is the vendor</p> <p>6 that they're buying the product from.</p> <p>7 Q. So that number is developed by Owens</p> <p>8 and Minor and given to you --</p> <p>9 A. Given to us.</p> <p>10 Q. -- to enter into the Lawson system?</p> <p>11 A. Correct. And when we send PO, this</p> <p>12 is the number they want to see -- this is the</p> <p>13 number they want to see in order for them to send</p> <p>14 us the right product.</p> <p>15 MR. GRAHAM: That's it. Thanks.</p> <p>16 MR. CLEMENTS: I don't have any more</p> <p>17 questions for Mr. Matias.</p> <p>18 Can we go off the record?</p> <p>19 THE VIDEOGRAPHER: Sure. Here marks</p> <p>20 the end of volume one, videotape number two in the</p> <p>21 deposition of Manuel Matias.</p> <p>22 Going off the record. The time is</p> <p>23 1:28.,</p> <p>24 (Counsel retains exhibits.)</p> <p>25 (1:28 p.m.)</p>	<p>96</p> <p>1 JURAT</p> <p>2 I, MANUEL D. MATIAS, do hereby</p> <p>3 certify that I have read the foregoing transcript</p> <p>4 of my testimony taken on Wednesday, March 10, 2010</p> <p>5 and have signed it subject to the following</p> <p>6 changes:</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>MANUEL D. MATIAS</p> <p>DATE: _____</p> <p>Sworn and subscribed to before me this</p> <p>day of _____, 20 .</p> <p>NOTARY PUBLIC</p>

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of August, 2010, I will electronically file the foregoing

**PLAINTIFF EPLUS'S OBJECTIONS TO DEFENDANT'S DESIGNATIONS AND
SUMMARY OF THE DEPOSITION OF MANUEL D. MATIAS AND COUNTER-
DESIGNATIONS**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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